

T E N N E S S E E   V A L L E Y   A U T H O R I T Y



**Natural Resource Plan Update**

# **Scoping Report**

**October 2018**



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## **Introduction**

TVA proposes to make numerous changes to the structure and programs identified in its Natural Resource Plan (NRP), which was completed in 2011. TVA developed the NRP to guide its natural resource stewardship efforts. The existing NRP addresses TVA's management of biological, cultural and water resources, recreation, reservoir lands planning and public engagement. The NRP also guides TVA in achieving the objectives of its Environmental Policy for a more systematic and integrated approach to natural resource stewardship. The purpose of the initial plan was to integrate the goals of these resource areas, provide for the optimum public benefit, and balance sometimes conflicting resource uses.

On July 16, 2018, TVA published a Notice of Intent (Notice) in the *Federal Register* to conduct the environmental review in accordance with the National Environmental Policy Act (NEPA) and published information about the review and planning effort on the TVA webpage (see Appendix A for the *Federal Register* Notice of Intent). TVA also notified the media and numerous individuals, organizations, and intergovernmental partners of the review. The Notice initiated a 30-day public scoping period, which concluded on August 20, 2018. As stated in the Notice, TVA determined that a supplement to the 2011 Natural Resource Plan Environmental Impact Statement (EIS) would be completed.

## **TVA's Objectives**

In the 2011 NRP, TVA committed to reviewing the NRP every five years and updating the plan to ensure it remains relevant. In 2016, in advance of the first update of the NRP, TVA's Natural Resources staff began a holistic review of the NRP and determined that after extensive discussion and consideration, the plan does not completely fulfill the purposes intended when completed in 2011. The primary deficiency of the 2011 NRP was that the document did not encompass all of Natural Resources' programs and stewardship functions. Since the 2011 NRP did not comprehensively cover all of Natural Resources' programs and functions, the document could not adequately guide the direction of Natural Resources' stewardship efforts. TVA concluded that the NRP was not fully serving as the guide for business and budget planning as was first envisioned, and the non-comprehensive program coverage has impacted the plan's usefulness to the Natural Resources group as a management guide.

Thus, TVA is proposing to update the NRP to improve its efficacy and is initiating an environmental review of proposed changes. TVA proposes changes to the NRP's structure and to the range of programs it identifies.

The 2011 NRP included six Resource Areas. Under the proposal, the updated NRP would be expanded to include 10 proposed Focus Areas that tell a comprehensive story of TVA's work in natural resources. Additionally, the 2020 NRP would serve as a strategic document that will guide the direction of TVA's resource stewardship over the next 15-20 years. The NRP creates a sound framework for balancing land use, human activity, and conservation in order to achieve the greatest public benefit from our natural

resources. As proposed, the 2020 NRP would provide strategic guidance and alignment of TVA's Natural Resources work as well as create efficiencies in business planning and stewardship project implementation. The proposed NRP update includes more clearly defined strategies such as objectives and programs for each focus area and a flexible approach for long-term planning, which would help TVA be better equipped to prioritize funding plans and support TVA's mission.

To complement the strategic guidance that the 2020 NRP would provide, TVA's Natural Resources group would develop a 3-5 Year Action Plan to provide a tactical approach to implement the specific activities associated with the ten Focus Area's programs. The two-pronged approach of a short term implementation strategy (3-5 Year Action Plan) that complements the long term strategic guidance document (2020 NRP) would provide the Natural Resources group the agility and flexibility necessary to achieve the goals of NR's Stewardship Strategy. This approach also supports the shift of the 2020 NRP to a strategic level guidance document that would retain long term relevancy, since adjustments in the implementation of the NRP due to changes such as availability of stewardship funding, new trends in public use and input from the public would be addressed through the 3-5 Year Action Plan.

The proposed update to the NRP would be consistent with the Blended Management alternative approved by the TVA Board of Directors in August 2011. Generally, the proposed objectives align with the resource area goals identified in the 2011 NRP. The proposed changes are being considered by TVA in a supplement to the 2011 EIS.

## **Background**

As part of the process of developing its NRP, TVA completed an Environmental Impact Statement (EIS) in 2011. The EIS describes the potential resource management programs and activities, alternative approaches to TVA's resource management efforts, and the environmental impacts of the alternatives, including the alternative comprising the NRP's preferred Blended Management alternative.

The 2011 NRP EIS identified four management alternatives:

- The No Action Alternative: Meeting regulatory and technical requirements and managing lands through existing prioritization methods that consider recreational needs and public safety, while meeting applicable regulations and policies.
- Custodial Management: Focusing management to ensure compliance with TVA's mission, applicable laws, regulations and other mandates; such management could have resulted in transitioning some management responsibilities to contractors or closing facilities, discontinuing some programs or projects, and reducing the level of effort in some areas
- Flagship Management: Proactive management of natural resources to increase stewardship to the "gold standard," enhancing recreation facilities

and opportunities while emphasizing sustainable technologies, facility management, and reducing impacts at heavily visited sites.

- **Blended Management:** Identifying and emphasizing key programs that are integral to enhancing future implementation efforts while maintaining activities and projects that address safety and are necessary to comply with TVA's mission and applicable laws, regulations, policies and other mandates.

On August 18, 2011, the TVA Board of Directors determined that the Blended Management alternative was in the best interest of TVA and approved its implementation. This decision was based on that alternative's alignment with TVA's Environmental Policy, its focus on certain key programs that establish a baseline for future enhanced implementation efforts, and the flexibility it provides for the use of partnerships, volunteers, and other sources of funding to leverage programs to their full potential while working within resource and staff constraints.

The 2011 NRP did not address numerous programs that are managed by TVA's Natural Resources group. The NRP does not address Section 26a permitting and land use agreements, public land protection, nuisance and invasive species management and ecotourism activities. TVA has a long history in implementing these activities, many of which have been central responsibilities of the Natural Resources group for decades.

In 2014, TVA's Board of Directors committed funds to support stewardship efforts to further protect natural and cultural resources on public lands and to improve recreational assets that enhance recreational opportunities for the people of the Tennessee Valley. The availability of this funding necessitated that TVA's Natural Resources group develop a strategy to prioritize its projects and maintenance needs. NR's Stewardship Strategy, adopted in 2016, more clearly identified Natural Resources' role in fulfilling TVA's mission to make the Valley the best place to live, work and play. Through the Stewardship Strategy, NR also seeks to be flexible and remain agile to the changing needs of its stakeholders, balance competing demands on resources and serve as a catalyst for collaboration with its partners. There are three goals of NR's Stewardship Strategy, which include:

1. Create and sustain destinations for recreation and opportunities for learning and research;
2. Protect and enhance biological, cultural, and water resources, and TVA's programmatic interests through integrated management of the Tennessee River system and public lands; and
3. Assist water-based community development with technical support, land agreements, and permitting using planning, clear regulations, meaningful guidelines, and consistent enforcement.

In 2016, TVA Natural Resources staff and managers reviewed the 2011 NRP to evaluate NRP stewardships efforts and identify whether the NRP needed to be updated.

Based on this assessment Natural Resources staff and management determined that updating the NRP was the best path forward to address identified concerns.

## **Environmental Review Process**

NEPA requires Federal agencies to consider and study the potential environmental consequences of major actions. The NEPA review process is intended to help Federal agencies make decisions that are based on an understanding of the action's impacts and, if necessary, to take actions that protect, restore, and enhance the environment (40 CFR 1500.1(c)). NEPA also requires that Federal agencies provide opportunities for public involvement in the decision-making process (for more information, visit [www.NEPA.gov](http://www.NEPA.gov)).

As noted, TVA intends to prepare a supplement environmental impact statement (SEIS) to consider the proposed updates to the 2011 Natural Resource Plan. During the completion of the SEIS, the public and other environmental and permitting agencies will have opportunities to provide input on the environmental review, including during the scoping period. After considering public scoping input, TVA will develop and publish a draft SEIS that will be posted for public review and comment. After the public review period, TVA will make revisions, if necessary, and publish a final SEIS. Comments on the draft SEIS will be addressed by TVA in the final SEIS.

During the initial public scoping period in July and August 2018, TVA estimated that the draft SEIS would be published in May 2019, the final SEIS would be published in early 2020, and a final decision would also be made in the spring of 2020. TVA will make final and publish the 2020 NRP concurrently with the final SEIS.

## **TVA's Natural Resource Plan Update EIS Webpage**

TVA is utilizing its existing corporate website as the primary platform for public outreach. The project website, [www.tva.gov/nrp](http://www.tva.gov/nrp), is intended to serve as the primary hub for distributing information to the public. Visitors can view informational sheets on the 10 proposed Natural Resource Focus Areas, which include:

- [Reservoir Lands Planning](#)
- [Section 26a & Land Use Agreements](#)
- [Public Land Protection](#)
- [Land & Habitat Stewardship](#)
- [Nuisance & Invasive Species Management](#)
- [Cultural Resources Management](#)
- [Water Resource Stewardship](#)
- [Recreation](#)
- [Ecotourism](#)
- [Public Outreach & Information](#)

During the scoping period, the webpage directed the public to submit scoping comments via email or mail to Matthew Higdon, TVA's NEPA Project Manager. Those

interested in the proposed Natural Resource Plan update were directed to contact Anthony Summitt, TVA's Senior Policy Specialist, Policy & Project Management. In addition to directing the public to submit their comments via email or mail, TVA provided a web-based comment submittal form on the project website during the scoping period. Public comments are included in Appendix E.

### **Public Outreach During Scoping Period**

As noted, TVA's public scoping period was initiated on July 16, 2018, with the publication in the *Federal Register* of a Notice of Intent to prepare an SEIS to assess the environmental impacts of the proposed Natural Resource Plan update. TVA also issued a press release announcing that public input was being sought on the proposed update to the NRP. Media outlets across the region published or broadcast stories based on the release (see Appendix C for the press release).

TVA also developed an initial project mailing list and sent postcards to notify those on the list of the project. The mailing list was derived from prior stewardship and natural resource efforts and included local, state, federal partners, non-governmental entities and other interested stakeholders. Approximately 250 postcards were mailed. At the time, TVA also placed newspaper advertisements in 37 newspapers around the region to provide notice of the planning effort, the public scoping meetings and to invite public comments (see Appendix D for a list of the newspapers and a copy of the advertisements).

TVA hosted four public scoping meetings at locations throughout the Tennessee Valley, including in Knoxville, TN, Chattanooga, TN, Muscle Shoals, AL and Buchanan, TN. TVA published social media posts and event reminders for the public scoping meetings. The four public meetings were attended by a total of 66 people.

Additionally, TVA hosted a webinar for the public on August 6, 2018, to provide the public another opportunity to obtain information on the proposed updated to the NRP. Twenty-eight people registered for the webinar.

### **Issues Addressed During Scoping Period**

In its Notice and on the website, TVA stated its intention to update the Natural Resource Plan that was adopted in 2011 and solicited feedback from the public on the 10 proposed Focus Areas and the programs associated with each focus area. TVA asked that new issues or information about other concerns related to TVA's natural resource stewardship activities also be brought to TVA's attention.

### **Summary of Public Scoping Feedback**

TVA received a variety of comments and opinions regarding the proposed changes to the Natural Resource Plan. TVA received a total of 29 submissions from members of the public and intergovernmental entities (18 email or online comment form submittals and 11 written comments).

TVA received comments related to the following topics:

- Aquatic Vegetation
- Silver Carp
- Nuisance and Invasive Plants
- Section 26a Applications
- Land Use
- Reservoir Lands Planning
- Shorelines Erosion
- River Operations
- Trails
- Recreation Partnerships
- Dispersed Recreation
- Ecotourism
- Habitat and Forest Management
- Prescribed Fire
- Economic Development
- Boundary Marking
- Violations and Encroachments
- Preserving Public Lands
- Public Outreach

TVA will consider the input receiving during the public scoping process during the development of the Draft SEIS and updated Natural Resource Plan (see Appendix E for all public comments submitted).

**Appendix A: Federal Register Notice of Intent (83 FR 32945, July 16, 2018)**

**SURFACE TRANSPORTATION BOARD**

[Docket No. AB 290 (Sub-No. 401X); Docket No. AB 1058X]

**Tennessee, Alabama & Georgia Railway Company—Discontinuance of Service Exemption—in Walker County, Ga.; Chattooga & Chickamauga Railway Company—Discontinuance of Lease and Trackage Rights Operations—in Walker County, Ga. and Hamilton County, Tenn.**

Tennessee, Alabama & Georgia Railway Company (TAG), a wholly owned subsidiary of Norfolk Southern Railway Company, and Chattooga & Chickamauga Railway Company (CCKY) (collectively, TAG and CCKY) are referred to as Railroads) have jointly filed a verified notice of exemption under 49 CFR pt. 1152 subpart F—*Exempt Abandonments and Discontinuances of Service* for (1) TAG to discontinue service over approximately 16.8 miles of rail line extending between milepost TA 6.3 (at or near Flintstone, Ga.) and milepost TA 23.1 (at or near Hedges, Ga.) in Walker County, Ga.; (2) CCKY to discontinue its lease of approximately 19.20 miles of rail line owned by TAG and the Alabama Great Southern Railroad Company (AGS) extending between milepost TA 3.94 (at Chattanooga, Tenn.) and milepost TA 23.1 in Hamilton County, Tenn., and Walker County, Ga.; and (3) CCKY to discontinue overhead trackage rights it holds over the following connecting lines, all located in Chattanooga, Hamilton County, Tenn.: (a) AGS's line between milepost G-2.66 at a connection with TAG and milepost G-1.02 at the north end of Shipp Yard, a distance of 1.6 miles; (b) Central of Georgia Railroad Company's (COG) line between milepost C-445.4 and its connection with TAG at milepost TA 3.94, a distance of approximately 1.5 miles; and (c) TAG's rail line between milepost TA 3.94 and milepost TA 3.39 (at TAG's connection with AGS), a distance of approximately 0.55 miles (collectively, the "Line"). The Line traverses United States Postal Zip Codes 30725, 30707, 37407, 37408, 37409, and 37410.

The Railroads have certified that: (1) They have handled no local or overhead common carrier service over the Line for at least two years; (2) overhead traffic, if there were any, could be rerouted over other lines; (3) no formal complaint filed by a user of a rail service on the Line (or by a state or local government entity acting on behalf of such user) regarding cessation of service over the Line is pending either with the Surface

Transportation Board (Board) or with any U.S. District Court or has been decided in favor of a complainant within the two-year period; and (4) the requirements at 49 CFR 1105.12 (newspaper publication) and 49 CFR 1152.50(d)(1) (notice to government agencies) have been met.

As a condition to these exemptions, any employee adversely affected by the discontinuances of service shall be protected under *Oregon Short Line Railroad—Abandonment Portion Goshen Branch Between Firth & Ammon, in Bingham & Bonneville Counties, Idaho*, 360 I.C.C. 91 (1979). To address whether this condition adequately protects affected employees, a petition for partial revocation under 49 U.S.C. 10502(d) must be filed.

Provided no formal expression of intent to file an offer of financial assistance (OFA) <sup>1</sup> to subsidize continued rail service has been received, these exemptions will be effective August 15, 2018, unless stayed pending reconsideration. Petitions to stay that do not involve environmental issues and formal expressions of intent to file an OFA to subsidize continued rail service under 49 CFR 1152.27(c)(2) <sup>2</sup> must be filed by July 26, 2018. <sup>3</sup> Petitions for reconsideration must be filed by August 6, 2018, with the Surface Transportation Board, 395 E Street SW, Washington, DC 20423-0001.

A copy of any petition filed with Board should be sent to the Railroads' representative, William A. Mullins, Baker & Miller PLLC, 2401 Pennsylvania Ave. NW, Suite 300, Washington, DC 20037.

If the verified notice contains false or misleading information, the exemption is void ab initio.

Board decisions and notices are available on our website at: [www.stb.gov](http://www.stb.gov).

Decided: July 11, 2018.

<sup>1</sup> The Board modified its OFA procedures effective July 29, 2017. Among other things, the OFA process now requires potential offerors, in their formal expression of intent, to make a preliminary financial responsibility showing based on a calculation using information contained in the carrier's filing and publicly available information. See *Offers of Financial Assistance*, EP 729 (STB served June 29, 2017); 82 FR 30,997 (July 5, 2017).

<sup>2</sup> Each OFA must be accompanied by the filing fee, which currently is set at \$1,800. See *Regulations Governing Fees for Servs. Performed in Connection with Licensing & Related Servs.—2017 Update*, EP 542 (Sub-No. 25) (STB served July 28, 2017).

<sup>3</sup> Because these are discontinuance proceedings and not abandonments, trail use/trail banking and public use conditions are not appropriate. Because there will be an environmental review during abandonment, these discontinuances do not require environmental review.

By the Board, Scott M. Zimmerman, Acting Director, Office of Proceedings.

Marline Simeon,

Clearance Clerk.

[FR Doc. 2018-15142 Filed 7-13-18; 8:45 am]

BILLING CODE 4915-01-P

**TENNESSEE VALLEY AUTHORITY****Supplemental Environmental Impact Statement—Natural Resource Plan**

**AGENCY:** Tennessee Valley Authority.

**ACTION:** Notice of intent.

**SUMMARY:** The Tennessee Valley Authority (TVA) intends to prepare a supplemental environmental impact statement (EIS) addressing proposed changes to its Natural Resource Plan (NRP). Public comment is invited concerning the scope of the supplemental EIS, including how the plan addresses TVA's management of natural and cultural resources and the environmental issues that should be addressed in the supplemental EIS.

**DATES:** Comments must be received on or before August 20, 2018. To facilitate the scoping process, TVA will hold public scoping meetings in late July and early August 2018; see <https://www.tva.gov/nrp> for the dates and locations of the scoping meetings.

**ADDRESSES:** Written comments should be sent to Matthew Higdon, Tennessee Valley Authority, 400 W Summit Hill Drive #WT11D, Knoxville, Tennessee 37902. Comments may also be emailed to [nrp@tva.gov](mailto:nrp@tva.gov) or submitted on the TVA website at: <https://www.tva.gov/nrp>.

**FOR FURTHER INFORMATION CONTACT:** For information on the EIS process, contact Matthew Higdon, NEPA Specialist, by email at [mshigdon@tva.gov](mailto:mshigdon@tva.gov) or by phone at (865) 632-8051. For information about the NRP, contact Anthony Summitt by email at [adsummitt@tva.gov](mailto:adsummitt@tva.gov) or by phone at (423) 467-3811.

**SUPPLEMENTARY INFORMATION:** This notice is provided in accordance with the Council on Environmental Quality's regulations (40 CFR parts 1500 to 1508) and TVA's procedures for implementing the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR part 800).

**Background**

TVA is an executive branch, corporate agency and instrumentality of the United States, established by an act of Congress in 1933, to foster the social and economic welfare of the people of the Tennessee Valley region and to

promote the proper use and conservation of the region's natural resources. Shortly after its creation, TVA began a dam and reservoir construction program that required the purchase of approximately 1.3 million acres of land for the creation of reservoirs within the Tennessee Valley region. Most of these lands are located underneath the water of the reservoir system or have since been sold by TVA or transferred to other state or federal agencies. Today, approximately 293,000 acres of land along TVA reservoirs are managed by TVA for the benefit of the public. Most of these lands remain undeveloped and have been managed by TVA for natural resource conservation, recreation, and the protection of cultural resources.

In 2011, TVA completed its first Natural Resource Plan to guide its stewardship efforts for managing the waters and public lands of the Tennessee River Valley. The NRP represents TVA's high level strategy for managing its natural resources in the near- and long-term. The purpose of the plan is to integrate the goals of resource management programs, provide for the optimum public benefit, and balance sometimes conflicting resource uses. The NRP also guides TVA in achieving the objectives of its Environmental Policy for a more systematic and integrated approach to natural resource stewardship.

When planning for the 2011 NRP, TVA completed an EIS that described the potential resource management programs and activities, alternative approaches to TVA's resource management efforts, and the environmental impacts of the alternatives. In the 2011 EIS, four alternatives were analyzed: The No Action Alternative, Custodial Management, Flagship Management, and Blended Management. In August 2011, the TVA Board of Directors decided that the Blended Management alternative should be implemented as the agency's plan because the alternative aligns best with TVA's Environmental Policy, focuses on key programs that establish a baseline for future enhanced implementation efforts, and provides flexibility for the use of partnerships, volunteers, and other sources of funding to leverage programs to their full potential while working within resource and staff constraints (75 FR 57100, September 15, 2011).

#### Proposed Update of the Plan

In the 2011 NRP, TVA committed to reviewing the NRP every five years and updating the plan to ensure it remains relevant and current. In 2016, in

advance of the first update of the NRP, TVA's Natural Resources staff began a holistic review of the NRP and determined that, after extensive discussion and consideration, the plan does not completely fulfill the purposes intended when completed in 2011. The 2011 NRP was not all encompassing of Natural Resources programs and by not being inclusive, the NRP was not comprehensive as desired. TVA concluded that the NRP was not fully serving as the guide for business and budget planning as was first envisioned, and the non-comprehensive program coverage has impacted the plan's usefulness to the Natural Resources group as a management guide.

TVA is proposing to update the NRP to improve its efficacy and is initiating an environmental review of proposed changes. TVA proposes changes to the NRP's structure and to the range of programs it identifies. TVA is seeking the public's input in determining the scope of its environmental review of these changes. The proposed update to the NRP would be consistent with the Blended Management alternative approved by the TVA Board of Directors in August 2011. TVA is considering these changes in a supplement to the 2011 EIS.

TVA proposes to update the NRP so that it is a more useful strategic document that outlines expected benefits and objectives for each of TVA's natural resource management programs. TVA proposes to reorganize the plan and its programs into ten new "focus areas" rather than the six resource areas in the 2011 plan. TVA would address additional program efforts in the NRP that were excluded from the current plan, namely: Permitting under Section 26a of the TVA Act and land use agreements; public land protection; nuisance and invasive species management; and ecotourism. TVA has extensive experience in conducting these efforts in the region and proposes to include them in the NRP to ensure that the plan addresses the entire scope of the TVA Natural Resources group's stewardship efforts.

In addition, certain programs described in the 2011 NRP would be regrouped to create focus areas that better reflect the Natural Resources' efforts in order to improve the plan's clarity and usefulness. TVA also proposes to remove some programs from its NRP because these programs are managed better by other entities (e.g., universities, other TVA organizations, non-TVA entities); however, even if a program would be removed from the NRP, TVA may continue to support the

management of these programs. Lastly, TVA proposes to add several new programs under the ten focus areas.

TVA proposes to update the NRP by grouping its programs into the following ten focus areas: Land and Habitat Stewardship (Biological Resources in the current NRP); Cultural Resources Management (currently Cultural Resources in the NRP); Water Resources Stewardship (currently Water Resources in the NRP); Public Outreach and Information (currently Public Engagement in the NRP); Reservoir Lands Planning (no change); Recreation (currently Recreation Management in the NRP); Public Land Protection (new); Nuisance and Invasive Species Management (new); Ecotourism (new); and Section 26a and Land Use Agreements (new). More information about the new focus areas and the changes to specific programs can be found at <https://www.tva.gov/nrp>.

Numerous other changes proposed by TVA are administrative or procedural in nature and are unlikely to impact the environment; these changes will be included in the scope of the supplemental EIS to ensure public disclosure of how the NRP would be amended. For example, TVA is proposing to change how its NRP would be updated and how the public would be made aware of its plan implementation. In the revised NRP, TVA would eliminate the provision of the NRP that calls for periodic (5 year) updates to the plan. Alternatively, TVA proposes to inform the public of its activities and progress by publishing an Annual Report on Natural Resources' stewardship efforts and by improving the information available to the public on TVA's stewardship projects on TVA's web page. TVA would provide multiple avenues for continuous public engagement and input, including through the Public Land Information Center, by incorporating a commenting mechanism into the NRP web page and by piloting region specific focus groups that would provide input regarding local needs and trends in the recreation and natural resource fields.

To complement the strategic guidance that the updated NRP would provide, TVA's Natural Resources group would develop a 3–5 Year Action Plan to provide a tactical approach to implement the specific activities associated with each of the ten focus area programs. TVA anticipates that utilizing a short term implementation strategy (3–5 Year Action Plan) that complements the long term strategic guidance document (the updated NRP) would provide the flexibility necessary to achieve the goals and objectives of

the NRP. This approach is intended to ensure that the NRP remains relevant in the long term, since adjustments in the implementation of the NRP (e.g., due to changes such as availability of stewardship funding, new trends in public use and input from the public) would be addressed through the 3–5 Year Action Plan.

TVA would also remove the “measures of success” for each program from the 2011 NRP, which experience has shown were too specific. The updated NRP would identify objectives for each focus area to provide high-level, overarching strategic direction for each area. The objectives for the focus areas align with the 2011 NRP resource area goals and would be substantially consistent with TVA’s Blended Management approach analyzed in the 2011 EIS. Instead of “measures of success,” metrics to measure achievement of focus area objectives would be incorporated into the 3–5 Year Action Plan.

#### Scoping Process

The revised NRP will be considered as an action alternative in the supplemental EIS. TVA invites the public to review the detailed description of its NRP program areas and the revisions to the NRP that is available on the TVA website during the scoping period and to submit comments, questions or suggestions on its proposal. Additional action alternative(s) may be developed based on public input submitted to TVA during the scoping period.

Public scoping is integral to the process for implementing NEPA and ensures that issues are identified early and properly studied; issues of little significance do not consume substantial time and effort; and analysis is thorough and balanced. TVA anticipates that the major environmental resource areas that will be addressed in the supplemental EIS will include water quality, water supply, aquatic and terrestrial ecology, endangered and threatened species, wetlands, prime farmlands, floodplains, recreation, aesthetics including visual resources, land use, historic and archaeological resources and socioeconomic resources.

TVA invites members of the public as well as Federal, state, and local agencies and Native American tribes to comment on the scope of the supplemental EIS. Comments on the scope should be submitted no later than the date given under the DATES section of this notice. Pursuant to the regulations of the Advisory Council on Historic Preservation implementing Section 106 of the NHPA, TVA also solicits

comments on the potential of the proposed Plan to affect historic properties. This notice also provides an opportunity under Executive Orders 11990 and 11988 for early public review of the potential for TVA’s proposal to affect wetlands and floodplains, respectively. Please note that any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection.

After consideration of the public’s input and analyzing the environmental consequences of alternatives, TVA will issue a draft EIS for public review and comment. TVA will notify the public of the draft EIS’s availability and plans to hold public meetings during the review period. TVA expects to release the draft EIS in mid 2019 and the final EIS and NRP in early 2020.

**Authority:** 40 CFR 1501.7.

**David Bowling,**

*Vice President, Land and River Management.*

[FR Doc. 2018–15161 Filed 7–13–18; 8:45 am]

BILLING CODE 8120–08–P

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## DEPARTMENT OF TRANSPORTATION

### Federal Highway Administration

#### Environmental Impact Statement: Lake, Cook and McHenry Counties, Illinois

**AGENCY:** Federal Highway Administration (FHWA), DOT.

**ACTION:** Notice of intent to prepare an environmental impact statement (EIS).

**SUMMARY:** The FHWA is issuing this notice to advise the public that an environmental impact statement will be prepared for a proposed transportation improvement project in Lake, Cook and McHenry Counties in Illinois.

**FOR FURTHER INFORMATION CONTACT:** Catherine A. Batey, Division Administrator, Federal Highway Administration, 3250 Executive Park Drive, Springfield, Illinois 62703, Phone: 217–492–4640. Paul Kovacs, Chief Engineer, Illinois Tollway, 2700 Ogden Avenue, Downers Grove, Illinois 60515, Phone 630–241–6800. Anthony Quigley, Deputy Director of Highways, Region 1 Engineer, Illinois Department of Transportation, 201 West Center Court, Schaumburg, Illinois 60196, Phone: 847–705–4401.

**SUPPLEMENTARY INFORMATION:** The FHWA, in cooperation with the Illinois Tollway and the Illinois Department of Transportation (IDOT), will prepare an environmental impact statement (EIS) for a proposed transportation

improvement project in Lake County, northern portions of Cook County, and eastern portions of McHenry County. The FHWA intends to issue a single Final EIS and Record of Decision (ROD) document pursuant to the FAST Act Section 1311 requirements, unless FHWA determines statutory criteria or practicability considerations preclude issuance of a combined document.

Improvements in the project area are proposed to reduce congestion, improve reliability of travel, improve travel options connecting major origins and destinations, and improve local and regional travel efficiency. Alternatives under consideration to address these needs include (1) improvements to the existing roadway network; (2) construction on new alignment; (3) improvements to transit, including rail and bus; (3) improvements to bicycle and pedestrian facilities; (4) transportation system management/transportation demand management strategies; and (5) taking no action.

Federal approvals needed for this project may include permits under Clean Water Act Sections 402 and 404 and Section 401 water quality certification. Section 7 consultation with the US Fish and Wildlife Service may also be required. The project will comply with the Clean Air Act, Title VI of the Civil Rights Act, Section 4(f) of the U.S. Department of Transportation Act of 1966, and Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” and other applicable state and Federal laws.

A Stakeholder Participation Group, consisting of community leaders, technical experts, and interest groups, has been formed as part of early coordination efforts to assist in the development of the purpose and need and to provide input on alternative evaluation. Additionally, all individuals and organizations expressing interest in the project will be able to participate in the process through various public outreach opportunities. These opportunities include, but are not limited to, the project website, public meetings and hearings, speakers’ bureau events, and press releases.

To ensure that the full range of issues related to this proposed action are addressed and all significant issues identified, comments and suggestions are invited from all interested parties. Scoping input on the proposed project will be invited during a public informational meeting scheduled for July 25, 2018, and may also be submitted via the project website or in writing to the Illinois Tollway, 2700

## Appendix B: TVA News Release

### TVA Invites Public Input on Proposed Natural Resource Plan (NRP) Updates

July 16, 2018

KNOXVILLE, Tenn. - TVA is updating the 2011 Natural Resource Plan (NRP) which guides the work conducted on the public lands and waters entrusted to TVA's management, as well as within TVA's power service area. The 2011 NRP organized TVA's work into six resource areas, but was not inclusive of all of TVA's Natural Resource (NR) efforts. In the 2020 NRP, TVA proposes 10 focus areas that provide a direct line of site to all NR functions. These focus areas include:

**Reservoir Lands Planning – Section 26a & Land Use Agreements – Public Land Protection – Land & Habitat Stewardship – Nuisance & Invasive Species Management – Cultural Resource Management – Water Resource Stewardship – Recreation – Ecotourism – Public Outreach & Information**

The proposed NRP update encompasses more clearly defined strategies, including objectives and programs for each focus area and a flexible approach for long-term planning, which will help TVA be better equipped to prioritize funding and support TVA's mission. TVA will complete an environmental impact statement to analyze the potential effects of these changes.

To guide the development of the 2020 NRP, TVA will host four open house public scoping meetings from 5:00 – 7:30 p.m. local time and a webinar to obtain public input, answer questions and receive comments at the following locations:

- July 25, 2018 Pellissippi State Community College in the College Center Room at 10915 Hardin Valley Rd., Knoxville, TN 37933
- July 26, 2018 Chattanooga State Community College in Rooms 124-126 at 4501 Amnicola Highway, Chattanooga, TN 37406
- August 1, 2018 TVA Multi-Purpose Building in Room MPB 01202 at 101 Reservation Road, Muscle Shoals, AL 35662
- August 2, 2018 Paris Landing State Park in Conference Room A at 400 Lodge Road, Buchanan, TN 38222
- August 6, 2018 Webinar. Please register in advance of the meeting at [www.tva.com/nrp](http://www.tva.com/nrp)

NOTE: Those with special needs who wish to attend any open house should contact TVA at least a week in advance at 1-865-632-6113.

TVA is seeking public input to identify issues and concerns that should be analyzed during the environmental review. TVA invites the public to visit [www.tva.com/nrp](http://www.tva.com/nrp) for more information about the proposed NRP update. Comments may be submitted at the public meetings or by mail or email. Any comments received, including names and addresses, will become part of the administrative record, and will be available for public inspection. Please submit comments by August 20, 2018.

Written comments should be sent to Matthew Higdon, NEPA Compliance, Tennessee Valley Authority, 400 West Summit Hill Drive, WT 11D, Knoxville, TN 37902-1499. Comments also may be submitted on the project website at [www.tva.com/nrp](http://www.tva.com/nrp) or by email at [NRP@tva.gov](mailto:NRP@tva.gov)

The Tennessee Valley Authority is a corporate agency of the United States that provides electricity for business customers and local power companies serving more than 9 million people in parts of seven southeastern states. TVA receives no taxpayer funding, deriving virtually all of its revenues from sales of electricity. In addition to operating and investing its revenues in its electric system, TVA provides flood control, navigation and land management for the Tennessee River system and assists local power companies and state and local governments with economic development and job creation.

## Contact

Jim Hopson  
TVA Public Relations, Knoxville, (865) 632-6000

[tvainfo@tva.gov](mailto:tvainfo@tva.gov)  
[\(865\) 632-8860](tel:(865)632-8860)

## Appendix C: List of Newspapers & Copy of Published Advertisement

The following area newspapers published notice of TVA's scoping period and meetings.

AREA SERVED	COUNTY	NEWSPAPER
<b><u>Knoxville, TN</u></b>	KNOX	Knoxville - Knoxville News-Sentinel
	ANDERSON	Clinton - The Courier-News
	ANDERSON	Oak Ridger - The Oak Ridger
	BLOUNT	Maryville - The Daily Times
	GRAINGER	Bean Station - Grainger Today
	JEFFERSON	Jefferson City - The Standard Banner
	LOUDON	Lenoir City - The News Herald
	ROANE	Kingston - Roane County News
	SEVIER	Sevierville - The Mountain Press
	UNION	Maynardville - The Union News Leader
<b><u>Chattanooga, TN</u></b>	HAMILTON	Chattanooga - Chattanooga Times Free Press
	BLEDSON	Pikeville - The Bledsonian Banner
	BRADLEY	Cleveland - Cleveland Daily Banner
	MARION	South Pittsburg - Marion County News
	MCMINN	Athens - The Daily Post-Athenian
	RHEA	Dayton - The Herald News
	SEQUATCHIE	Dunlap - The Dunlap Tribune
<b><u>Paris, TN</u></b>	HENRY	Paris - Paris Post-Intelligencer
	BENTON	Camden - The Camden Chronicle
	CARROLL	McKenzie - The McKenzie Banner
	STEWART	Dover - Stewart County Standard
	WEAKLEY	Dresden - Dresden Enterprise
	WEAKLEY	Martin - Weakley County Press
<b><u>Muscle Shoals, AL</u></b>	COLBERT	Tuscumbia - Colbert County Reporter
	LAUDERDALE	Florence Times Daily
	LAWRENCE	Moulton Advertiser
	FRANKLIN	Red Bay News
	FRANKLIN	Russellville - Franklin County Times
<b><u>Tri-Cities, TN</u></b>	SULLIVAN	Bristol - Bristol Herald Courier
	SULLIVAN	Kingsport - The Kingsport Times-News
	WASHINGTON	Johnson City - Johnson City Press
	WASHINGTON	Johnson City - The Johnson City News & Neighbor
	WASHINGTON	Jonesborough - The Herald and Tribune
<b><u>Western NC</u></b>	GRAHAM	Robbinsville - The Graham Star
	CHEROKEE	Murphy - The Cherokee Scout
	SWAIN	Bryson City - The Smoky Mountain Times
	CLAY	Hayesville - The Clay County Progress

# Notice of Public Meeting



## Public Scoping for TVA's Natural Resource Plan Update

TVA is updating the 2011 Natural Resource Plan (NRP) which guides the work conducted on the public lands and waters entrusted to TVA's management, as well as within TVA's power service area. The 2011 NRP organized TVA's work into six resource areas, but was not inclusive of all of TVA's Natural Resource (NR) efforts. In the 2020 NRP, TVA proposes 10 focus areas that provide a direct line of sight to all NR functions. These focus areas include:

**Reservoir Lands Planning – Section 26a &  
Land Use Agreements – Recreation**

**Public Land Protection – Land & Habitat Stewardship – Ecotourism**

**Nuisance & Invasive Species Management –  
Cultural Resource Management**

**Water Resource Stewardship – Public Outreach & Information**

The proposed NRP update includes more clearly defined strategies, including objectives and programs for each focus area and a flexible approach for long-term planning, which will help TVA be better equipped to prioritize funding and support TVA's mission.

To guide the development of the 2020 NRP, TVA will host an open house public scoping meeting to obtain public input, answer questions and receive comments on July 25, 2018, from 5:00 to 7:30 p.m. at Pellissippi State Community College in the College Center Room at 10915 Hardin Valley Rd., Knoxville, TN 37933.

TVA is seeking public input to identify issues and concerns that should be analyzed during the environmental review. TVA invites the public to visit [www.tva.com/nrp](http://www.tva.com/nrp) for more information about the proposed NRP update. Comments may be made at the public meetings or by mail or email to the addresses below. Any comments received, including names and addresses, will become part of the administrative record, and will be available for public inspection. Please submit comments by August 20, 2018.

**Matthew Higdon**

NEPA Compliance  
Tennessee Valley Authority  
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TVA is seeking public input to identify issues and concerns that should be analyzed during the environmental review. TVA invites the public to visit [www.tva.com/nrp](http://www.tva.com/nrp) for more information about the proposed NRP update. Comments may be made at the public meetings or by mail or email to the addresses below. Any comments received, including names and addresses, will become part of the administrative record, and will be available for public inspection. Please submit comments by August 20, 2018.

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TVA is seeking public input to identify issues and concerns that should be analyzed during the environmental review. TVA invites the public to visit [www.tva.com/nrp](http://www.tva.com/nrp) for more information about the proposed NRP update. Comments may be made at the public meetings or by mail or email to the addresses below. Any comments received, including names and addresses, will become part of the administrative record, and will be available for public inspection. Please submit comments by August 20, 2018.

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## Appendix D: TVA Postcard to Local, State, Federal Agencies, Non-Governmental Entities and Interested Stakeholders

### **PUBLIC NOTICE:** Public Comment Period and Public Meetings



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Tennessee Valley Authority  
400 West Summit Hill Drive  
Knoxville, TN 37902



## Appendix E: Comments from the Public

Comments Submitted by the Public at NRP Meetings in  
Knoxville, Chattanooga, Muscle Shoals and Paris.

### **John Hargett**

*The main problem with the Natural Resource Plan is that there is one. Most all TVA Land should be sold for the highest possible price. No restrictions should be placed on the buyer's use of the land. In a free market, the land will seek its highest and best use. This will benefit everyone.*

### **Bruce Blohm**

*Asian Carp are a dreadful problem. I am glad watershed steward programs are creating progress. We must step it up-Relationships with universities, scientific engineering solutions, money spent. The most important work is to eliminate further impact on our ecology, our recreation, and our economy-NOW.*

### **Jackie Posey**

*I enjoyed the connections and the conversations. We have education to present to save the beauty and resources for future generations. Thank you folks for all you do. We will work together for the future of our children.*

### **Scott Steel**

*The recreation on Kentucky Lake is negatively affected by the August drawdown of the lake levels. I realize it is a complex multiuse situation but it seems that flood control and mudflat habitat would not be negatively impacted by waiting a month or so to drop the lake levels.*

### **John Anderson**

*Lake levels drop way too early! Should drop September or so.*

### **Daniel Fletcher**

*Awesome to see mountain biking potential. I am in full support and will be in contact. Thanks for the NRP meeting!*

### **John Hubbard**

*\$15 million spent developing the Olympic section of the Ocoee River with the view that a reasonable time after the 1996 Olympics, it would significantly help the economy of Polk County and other areas around the Olympic section. I hope the new Natural Resource Plan and its Ecotourism, Recreation and Public Outreach and information parts will help do actions to help this investment come to fruition at a better pace than the past 22 years have seen.*

*1. How will this Natural Resource Plan be updated/changed/improved with the newly signed 15 year release schedule for recreation/tourism/economy building on the middle and upper Ocoee River?*

2. Will flowing rivers be a focus area in the updated plan? As best as I could figure out from the 2011 update it was not. Just lakes and land were addressed as natural resource areas.

**Gary Satin**

*Each department here should have made a presentation of what they do and then have the public have a question and answer period.*

**Martha Yanchyshyn**

*We live across the road from Cross Creeks National Wildlife Refuge. When the whole national system learned the use of neonicotnoid (sp?) pesticides and GMO crops, we were thrilled. Observed much more diversity of wildlife, plants, and insects on our property and are again keeping honey bees, which are now endangered. Please have these things on your land. The Cumberland Fossil Plant recently acquired 1000 acres in Wells Creek Basin, a vector impact site of great scientific interest. I would be very happy if the unique geology of this site could be presented to the public in some way. It's fascinating!*

**Nancy Mure**

*I am very grateful for NEPA and this TVA public scoping process. I voice my support for maintaining wild and scenic areas everywhere possible within the TVA lands. I am in full support of inhibiting development of shoreline and also public lands that are forested and which serve as critical habitat for all wildlife. I am in full support of LOW impact recreational sites to accommodate camping, hiking canoeing and fishing (where safe to eat). I diligently request that now and in the future TVA policy favors preservation of ALL TVA public lands and discourages High Impact privatization and development. TVA is the gatekeeper for our beautiful valley and quality of our water and air is heavily affected by decisions made by the board. I am in concurrence with most objectives shared at this meeting. I do fear the balance of public/private partnership could be SWAYED in favor of privatization and exploitation of natural areas thus degrading necessary natural systems. Please keep stewardship preservation and PUBLIC land protection uppermost in all future decisions and policies.*

**James Bedsole**

*The ORBC adjoins the MS Reservation on West side. Discussions have been made to Samantha Strickland on getting development on south bank of river at ORB and Paton Island. See my 3 page write up on vision for the future in M.S. I am a 33 year TVA retiree (1965 to 1998).*

Mr. Besole's letter is included below:

Written by  
James Bedsole

A Vision for the Future  
Shoals Center Development (SCD)

The Tennessee River in northwest Alabama divides Lauderdale County (Florence) on the north bank and Colbert County (Sheffield, Muscle Shoals, and Tuscumbia) on the south bank. Because of limited resources, much of the river front in these cities goes undeveloped. Muscle Shoals and Tuscumbia have limited frontage on the south bank below Wilson Dam. They would however, be greatly benefitted by river front development when new visitors purchase goods, meals, gas, or products at local outlets.

**A New Development Project**

The Tennessee River may be the greatest asset in the quad cities; but lack of accessibility to that resource can be frustrating for both the local public and visitors. Good parks in the quad cities are impressive; but are scattered mainly away from the river. To develop the river and waterfront, the four cities would require a region attitude. Development of the riverfront in any city will benefit the others also.

**Focus/Coordination**

Each of the four cities in the Shoals has planning groups, but there appears to be a lack of focus, communication, and coordination between cities to develop a large shared project. Thus each city has a list of projects that they need without regard to the other cities. Often a narrow focus for one group with a pet project will mean the project cannot be implemented for lack of general support. To solve community problems, they must overcome constraints and organize to overcome whatever constraints that are holding the community back.

Such an effort and attitude was undertaken locally to develop and finance the Robert Trent Jones golf courses and the Marriott Shoals Hotel complex. A similar effort is needed to develop the SCD project (Shoals Center Development). The "Shoals" would emphasize the early history when swift moving water across the shoals in the river made navigation difficult. To maximize the enormous potential by the open space resources along the three to four miles below Wilson Dam on the Tennessee River would require the coordination and support of the four cities.

**Lands North of the River**

The land in Florence between Wilson Dam and O'Neal Bridge gives the feeling of "you can't get to the north bank from here" due to industry and an established neighborhood. With the advent of the new Singing River Bridge, the new regional North Alabama Hospital complex, the Renaissance Tower, Marriott Shoals Hotel and Conference Center, a clear opportunity exists to access the river. The need is most clear to tie the East Florence Business area to the Marriott Shoals Hotel by way of the pedestrian bikeway that runs along the shoreline of the Wilson Canal. This would open further development of the historic wagon works as well as the redevelopment of the established, but aging neighborhood, that is south of Veteran's Drive. An urban renewal of part or all of this one mile stretch would allow for planning of additional park access to the river trail.

The development in McFarland Park, Visitor Center, marina, and Indian Mound Museum gives a clear indication of the need and opportunity for what this could be. The possibility of a connection of this river trail to Patton Island from the Singing River corridor will be discussed later. The extension of the river trail from the Singing River Bridge to McFarland Park seems to be blocked due to the land being tied up by industries.

**Lands South of the River**

Lands on the south side of the river are comprised of the Old Railroad Bridge that spans the main river channel (1,600' long) and lands controlled by TVA but designated for recreation. TVA lands include seventeen miles of hiking, walking, and bike trails along with the former historic Southport site that adjoins the Railroad. TVA also controls the 350 acre Patton Island that is in the middle of the river. Someone has said that Patton Island would truly be a Central Park. The access to Patton Island would be a short twenty-five foot extension from the north end of the Old Railroad Bridge or by boat. Access to Patton Island is highly desirable from the north side of the river to accommodate visitors from the Marriott Shoals complex. Access to the island also could be obtained by using the Singing River Bridge pedestrian way to cross the canal and then provide steps or ramp to descend to the island. The island margins could be flooded, but the main island spine, per TVA, floods only once in forty years. Thus, like McFarland Park, would need to be patrolled by Park Rangers. The island would be ideal for hiking and biking trails as well as nature and bird watching. By removing the dike at the west end of the island bypass canal, boat campers could access the center

of the island. This would be a unique feature for nature watchers to picnic or camp by canoes.

The TVA lands south of the river should be an opportunity to add to what TVA has begun. By developing a partnership with TVA, the seventeen mile trail system for walking, jogging, or cycling the beautiful historic nature trail system could be developed. Community botanical gardens or nature exhibits could add to educational, cultural, and visitor enjoyment of the river overlooks in the Shoals.

The Shoals gateway opportunity should be enhanced where O'Neal Bridge crosses the river to leave an iconic powerful visual image of the quad cities. This presents the opportunity to light portions of the bridge structure itself and even the 178 year old railroad structure upstream. The ORB should be incorporated into the Shoals image much like the structures in other areas such as the Vulcan statue in Birmingham, The St. Louis Arch, the Brooklyn Bridge, or the Statue of Liberty in New York. The ORB is a symbol to unify our area as the "Shoals".

One city (Sheffield) is actively trying to develop a one mile tract of undeveloped, inaccessible land that is four miles below O'Neal Bridge and 1.5 miles below their municipal river front park. The concept planning for the ambitious project is progressing; but funding is not complete. Other worthy multiyear projects have failed for lack of sufficient funds from private sources. The Shoals Center concept of cooperation with the four cities could provide additional funding to make this project successful. A city or county wide gas tax, similar to the way used to fund the Robert Trent Jones golf course, could be used. Other funding sources are also possible.

By developing the river front, the quality of Living would be improved to attract new or expanding industries. New companies in Decatur or Huntsville that need parts supplied would have a great place to live if they located in the Shoals.

### **Image/Access Opportunities**

There are clear opportunities to improve the image, environment, and culture in the Shoals by embracing the "Shoals Center" concept. A program to improve the Tennessee River corridor would ultimately lead to improved road corridors through all four cities. It would provide a perception of excellence to the community residences, to visitors, and to industry to locate in our North West Alabama area.

**Public Comments Submitted Online to TVA's  
Customized Comment Management System**

**Jim Herrig**

*There is an ecological need to restore an annual, minimum flow in the Ocoee River below Ocoee Dams #1, #2 and #3; and in the Hiwassee River below Appalachia dam. These may be the largest rivers in this country with no provisions for perennial flows. The aquatic diversity in these river segments could support some of the highest numbers of native species of fish, mussels, snails, crayfish, and other aquatic organisms in the country. Several federally listed aquatic species already occur within one of these segments and others could be restored. High quality fishing habitat could be established. The aquatic communities will never fully recover until goals are set and flows are maintained. TVA has the responsibility to restore these rivers to their full ecological potential.*

**Kevin McCarley**

*I believe Northwest Alabama has a vast amount of possibilities with mountain biking and ecotourism. We have large interest in mountain biking and many people who ride but we travel out of town and to other states to spend our money. We have trails but little or no local support to build and maintain those trails. Presently all mountain bike efforts are 100 percent volunteer and that only goes so far. We need to follow the example of Anniston, Auburn, Huntsville and countless other towns that already support the mountain bike community and local economy.*

**Steven Weaver**

*Thank You for the opportunity to comment. I am a lifelong resident of the TVA area (Norris, Tennessee) and for 18 years owned lake property on Norris Lake. For at least the past 10 years I have been appalled at the destruction of the Norris Lake Shoreline caused by the advent and explosion in popularity of so called 'Wake Boats'. Two of the boats I observed this year were aptly and ACTUALLY named 'Wake Setter' and 'B-52'. They should be joined by 'Shoreline Eradicator' and 'Siltation Accelerator'. I even witnessed a local channel television show last year sponsored by the TWRA that showcased a young lady riding a wake board behind one of these boats on a TVA Lake (Ft. Loudon I think) WITHOUT A PULL ROPE!! That's right...the boat she was surfing behind was throwing such a tremendous wake that she was surfing behind and keeping up with the 'tow' boat with no pull rope...and the TWRA host was just gushing about what an incredible and amazing job she was doing. Wow...*

*If you want to easily observe the phenomenon I am talking about (TVA shoreline destruction), all you have to do is head across Norris Dam right now and gaze over at point 1 on the North side of the harbor. You will need a map, however, if you don't know the lake because the Point 1 sign is gone along with the land and tree it was attached to for decades. Check it out...chunked into the lake along with the landslide that went with it.*

*I am a firm advocate of people being able to do what they wish as long as it does not interfere with the rights, privileges, and freedoms of others. I can see NO WAY that boats designed and operated for the purpose of creating massive wakes can be operated on any TVA lake without doing all three. They are a nuisance, a safety hazard to other boaters and swimmers, and a very destructive force to the public and private property along TVA Shorelines.*

*Thank You again for the opportunity to comment.*

**Laura Qualman**

*Hello, the last few summers we have been tooling around beautiful Tim's Ford quite frequently and have decided just recently that purchasing a lake home would be a great option. Besides the initial sticker shock the most disturbing thing we have found is that when you see a dock in pictures or on maps that it is not always the case that the dock has a permit. This makes finding a desirable lake home even more frustrating and challenging.*

*The one home in particular has the cutest small boat dock/slip in the most perfect unnoticeable spot at the closest spot to their property line at the end of a cove.*

*It seems to me that some of the plans stated in 1999 or earlier should probably be tweaked once again. I know the Zone 4 areas were created to hopefully lessen the number of docks dotting the shoreline but after trolling most of the lake I can honestly say I would prefer this small size dock (maybe 200SF) they are using at the end of a cove instead of the many huge private docks and ginormous community docks that have been built and some erected too close together and/or really too far out from shore.*

*The green areas were created to allow public access too and yet the public that is most likely to use it can't access the lake like previous landowners did because that past landowner didn't either have the knowledge or money to pursue making the docks/piers legal by filling out the 26a permit form in the allotted time. This seems like such an injustice to these current property owner's/tax payers and you are ultimately unfairly lowering the values of their property.*

*Of course I would say you cannot and should not open the entire green spaces up but perhaps you could give current dock owners that fit certain criteria the opportunity to get permits - and maybe even invite a few new property owners that say have their property lines within 250 feet of the water and/or are located at the end of a cove. There might even be one or two other scenarios that could be considered. In the case of more than one land owner at the end of a cove you could suggest they share one bigger dock. The dock permit prices could also be geared toward encouraging smaller size docks - under 250sf (with or without covers) is \$200. I'm really not sure what the price is now.*

*Thanks for your consideration and please don't hesitate to contact me.*

**Sandra Goss**

*I write on behalf of Tennessee Citizens for Wilderness Planning, an Oak Ridge-based environmental advocacy organization with members across the state. TCWP partners with Tennessee Valley Authority to steward the Worthington Cemetery Ecological Study Area and the Whites Creek Small Wild Area through annual invasive plant removal and trail maintenance events.*

*The 2020 Natural Resource Plan is commendably thorough; it is hoped that the expanded number of focus areas from six to ten fosters more attention to each of these areas.*

*Particular and immediate attention is needed to the significant loss of land due to erosion caused by boat wakes and to the mussel die off in the Clinch River.*

*Please develop an Herbicide Application Alert so that hikers and neighbors can plan around herbicide drafts on to trails and private lands.*

*In managing the public lands and land rights, special efforts should be made to increase the amount of public land that is managed at the most protective level.*

*Finally, regarding staffing, there is a need to replace the many professionals who have retired in the last 10 years with qualified natural resource professionals. The old structure with watershed-level planning and staffing was much more effective and agile than the current valley-wide approach.*

*Thanks for this opportunity to comment on the Natural Resources Plan, and TCWP looks forward to future collaborations with TVA.*

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**Steven Cottrell**

*Comments by Stephen Cottrell Regarding TVA NRP 2020 -*

*Thank you for the opportunity to provide comments on TVA's Natural Resource Plan 2020. I attended the public forum at Pellissippi State University in Knoxville, Tn. on July 25, 2018. This was an excellent format with the ten proposed focus areas represented and knowledgeable staff present to provide information. Face to face interaction with TVA staff gave a personal quality to TVA. This fosters goodwill and allows for questions and answers to be addressed. Periodic gatherings of this type in addition to major TVA initiatives would foster Public/TVA communications and goodwill.*

*Focus Area Comments*

*Recreation* - Clearly mark TVA property lines with signage on areas receiving dispersed recreation activity. This is increasingly important as adjacent private land become more developed and some private property owners do not view public lands as public.

*Continue to provide access to TVA lands through road improvement, signage, parking areas and both electronic & paper maps.*

*Land & Habitat Stewardship* - Create and maintain a variety of native vegetation types and stages on TVA lands, ranging from open areas, shrub areas, young-age forest, medium-age forest and old-age forest. This will provide habitats for a wide range of wildlife species from butterflies to black bears. Habitats should also be managed in the context of surrounding land use, geographic location and public use.

*Public Outreach & Information* - The stated objectives of this focus area are important. The success will hinge on the user's personal experience on TVA Lands and projects. Every stakeholder and customer needs to feel valued.

*Public Land Protection* - Clearly mark and maintain property boundaries. It is hard to manage or use TVA Lands unless you know where they start and end. I have observed that unmarked lands receive more abuse and discourage responsible use.

*Section 26a Permitting & Land Use* - Pursue correction and resolution of violations and encroachments in a consistent and timely manner.

*Ecotourism* - This sounds like a new area for TVA with high potential to support TVA's conservation-based work. I look forward to seeing how this develops.

*Final Overall Comment* - Keep TVA Public Lands Public!

*Additional Request: Please mail one hard copy each of the NRP 2020 handouts for the 10 focus areas that were available at the public meeting.*

## Public Comments Submitted to TVA's Email Address

### Carl Scarbrough

*Since TVA is requesting public input on your NRP program, I thought I would provide some input based on our experience with TVA's Land Use Policy and Reservoir Land Use & Permitting group over the last 6 months. I don't have a lot of confidence that this will get to the right person to effect any change, but feel it can't hurt since we have experienced a less than ideal response and ordeal with TVA. To make it even more disappointing I am a retired career TVA employee.*

*We have been working with TVA for over 6 months now on getting our property (not TVA's) approved so we can build on our land. We have spent over \$3000 on TVA required fees and surveys and still don't have the approval we need. We were told it would not take anywhere near this long unless TVA was not able to do a survey for an endangered plant in the spring and then it could take another year. We did everything to make sure that the survey could be done in the spring and in fact it was done near the end of May. I was there while the TVA botanist did the survey and it only took them 1 hour at my property. They also stated they weren't sure why they were having to do this survey as it was not normal and wasn't really needed. They didn't find any of the endangered plants and we thought we would finally be close to starting our home.*

*We thought we would soon get our permit approved where we could start clearing trees and building our home. However, after contacting TVA multiple times before getting a reply, we were then told that an additional requirement had been added in April and that now a survey for bats would have to be performed. After nearly 2 months we finally were able to get a response stating that TVA came up to our neighborhood, not our actual property, and that there were most likely bats in the area. We were told on the phone that we could pay to have the bats mitigated or probably wait until the fall so we wouldn't have to pay more since they would be gone. We were told by RaSharon King that she had an email drafted to send us with the details but she was waiting on approval to send. It is now been over 2 weeks and still no email or further information on the bats. We question whether a visit to our property actually occurred since the other homes and our property are behind a locked gate and there is also no address showing the location.*

*We have received very poor service from the new contact person in this group. We have not been kept up to date on the process, and have trouble getting returned emails and phone calls. We received very prompt service and information from Ben Bean in the early stage of the process and then recently after contacting him since we haven't heard from the new point person. We don't agree with the added requirement on the bats since it was not in place when we first submitted our paperwork to TVA back in February. It is our hope that those changes requiring bat investigation will be lifted for our project since our application was underway before the changes were introduced. Your website states that "TVA will evaluate and develop permitting and land use agreement procedural efficiencies and establish clear and meaningful policies, rules, and procedures." Please note that the process that we have had to go through during these 6 months is not at all efficient, clear, nor meaningful and I hope other property owners won't have to go through the same delays and changes that we have had to endure. Please forward this email to the proper group to help see that our voice is heard and to hopefully help us get the answers we need and closure to this process. We would also be glad to talk to someone to help make the process more efficient and if it will help get closure on our permit.*

**Eric Fleming**

*Comment #1*

*I saw the notice in the paper about TVA public input so here we go. I am very concerned about the advance of Asian carp, especially Silver carp up the TN River.*

*The technology has been around for a decade because of research done to save the Great Lakes, and yet nothing has been done in TVA's responsibility area. Silver have been seen at Wheeler so they will be in Guntersville in months, Nickajack in maybe a year, and Chickamauga in probably less than 2 years.*

*In addition, Flathead have been found around Dayton, TN. Both these findings are very disturbing. Why haven't low voltage electric barriers and sound barriers been installed at Guntersville, Nickajack, Chickamauga, and Watts Bar already?*

*We're looking at \$10 million to do all 4 locks, compared to billions in losses once the ecosystem and native species are destroyed, along with the recreation industry around Chattanooga when power boats won't be able to operate without risking serious injury. Let alone jet skis and water skiers.*

*So, who is responsible for this mess? TVA, TWRA, Corps of Engineers, or others? More importantly, who is going to fix it? Why have the carp been allowed to come so far up from the Mississippi? And Silver Carp are already up to Dalton, GA in the Conasauga River.*

*TVA keeps telling us that you own all the water in your jurisdiction (based on having to pay TVA for using your water on the Ocoee for rafting). Fair enough, but then take care of it. I'm hoping that this problem gets fixed today, and that is still years too late. Talk and studies are not the answer. Just fix it.*

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**Eric Fleming**

*Comment #2*

*Please have your TVA people get together with this group and work on the Silver carp issue together.*

*Mr. Fleming included an email chain from the Watts Bare Ecology and Fishery Council (WBEFC), [www.wbef.org](http://www.wbef.org).*

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**Eric Fleming**

*Comment #3*

*The Skull Island Campground is just upstream from Harrison Bay on Chickamauga Lake. The operator has retired and the lease is going to be rebid. It really is a shabby place and I doubt it makes much money and really needs an upgrade.*

*Please take this downtime to do upgrades there. There is no power, and most sites are too small and difficult to get into, even for a pop up camper, meaning it's mostly tent camping. The campground has been there forever when people were more hardy and didn't insist on A/C, and people today want power for all their devices and Wi-Fi.*

*Chester Frost, Harrison Bay and Shellmound are awesome but stay full most weekends, and even reserving a shelter (pavilion) is hard to do. Meanwhile Skull Island sits half empty. There is no more riverfront property that is decent, affordable, and available in the area and the most needs to be made of Skull Island to relieve some of the pressure of a growing population.*

*Either TVA needs to make improvements now, or find a new operator who will do it. It needs more sites with water and power at least. Wi-Fi would be nice.*

**Eric Fleming**

*Comment #4*

*I was very disappointed to see new construction going on at the Shellmound gated community site, and to find out that TVA has granted several extensions to the banks holding the property after the original terrible deal fell through.*

*I understand that the deal to bulldoze the campground is still in play at a huge loss to public access. I know that another campground is supposed to be built on an inferior site that the builders didn't want for obvious reasons, and it will have less waterfront.*

*It's very sad that TVA has sold out tens of thousands of people who use the campground, ramp, picnic areas and pavilions per year there when it was supposed to remain for public use.*

*Whether the campground is moved or not the damage is done as no one is going to invest in campground improvements, maintenance, or badly needed expansion when it could be bulldozed at any time.*

*There was no public input before allowing contract extensions which is probably illegal also.*

*Why can't the developer build houses on both sides of the campground instead of moving the campground? Moving the campground will be very expensive, which just proves what a bad deal the public is getting in the exchange. Is there anything anyone can do at this point to save Shellmound?*

**Sam Pendleton**

*TVA should rethink how the in-lieu tax money is distributed such that private schools are eligible for a portion of the payment.*

**Doug Hall**

*I read an article in the Athens Tennessee newspaper that said you guys were looking for comments on the 2020 NRP. I had some trouble with the link but it could have been caused by the severe storms we had. I was able to find a map of TVA land but wasn't able to find anything that described the parcels of property (acreage, access points, allowed activities, etc.). Did I just miss that or is there a comprehensive list out there and I just can't find it?*

**Joe Feeman**

*Attached are my comments on the update of the Natural Resources Plan.*

*Comments on the TVA Natural Resource Plan update TVA's efforts to implement the Natural Resources Plan and Stewardship Activities are commendable; however, the expertise to accomplish this is not present at TVA anymore. The constant drain of natural resource professionals over the last 10 years has left TVA without this necessary component. TVA has not filled these positions with new employees that possess the needed knowledge, but instead, has moved other TVA employees, without the required qualifications, into them. Therefore, until TVA hires more resource professionals, natural resource management of TVA lands will be compromised greatly. This will only be exacerbated as the few employees that are natural resource professionals by training and experience retire.*

At one-point TVA was developing 'Unit Plans' and associated Environmental Assessments for selected areas of TVA reservoir lands (Norris Reservoir – Fullerton Bend and Davis Creek; Cherokee-Noeton, etc.). These plans were developed with public input and a 25-year schedule of natural resource projects was prepared. They were a success with the public because they could see what TVA was planning. These plans were also revenue positive, with periodic small timber sales producing enough revenue to exceed other project costs. To collect input and recommendations from other resource agencies, NGOs, and interested public, field trips were conducted on the units. Reaction was overwhelmingly positive. TVA needs a similar process to manage lands for the long term. Currently, it looks like TVA is just 'throwing' money at the lands, without a long term vision (this is also due to the lack of expertise). TVA, rate payer, money should be spent wisely and not just spent to be spent.

Water Resources Stewardship – TVA should lead its partners in protecting the Clinch River. They tout the diversity of fish and freshwater mussels, but what are they doing to actually protect this fauna. Recent mussel die offs are not being addressed sufficiently and the cause is not being strongly pursued. Mussel populations have plummeted over the last 20 years. TVA needs to get other state and federal agencies, NGOs, and the public to take action to protect the Clinch River, before it is too late. TVA should join the recent commitment by the state and other federal agencies.

Shoreline degradation – Since the Lake Improvement Plan (LIP) was adopted, the reservoir shoreline on tributary reservoirs has been ravaged by wave action. Shoreline erosion is significant. This was not adequately covered in the LIP EIS. TVA needs to reevaluate the damage that is being done to shorelines and amend the LIP EIS and hopefully the guide curve for lake levels.

The LIP also calls for higher water levels in winter drawdowns; this causes TVA to sluice water because there is not adequate storage in winter to catch rains. So TVA wastes millions of gallons of water that would otherwise generate power through the turbines. These are "reservoirs"; look up the definition. I thought TVA had a goal of 'clean, affordable power'? It doesn't get any cheaper than hydro. Why is TVA charging for lost power revenue from the Ocoee releases and not for lost power because of the LIP? This benefits the shoreline home owners and marina operators; what is the difference? Again, another double standard. The amount of power produced by the Ocoee is a drop in the bucket compared to Norris, Fontana, and other tributary reservoirs.

Land, Wildlife and Habitat Management –

Wildlife Openings: Why has TVA quit maintaining openings through control burning? This is the most beneficial and cost effective tool for management. Many thousands of dollars were spent developing the openings and they were managed by periodic burns, but now the burning has stopped and the openings are suffering because of it. Other openings that were in native grasses have been planted in trees. This is ludicrous; openings are the most needed element on TVA lands.

This category should include forestry, which is the science that creates and maintains healthy forest communities. It is also the most effective tool for wildlife management; diverse wildlife communities are the result of diverse habitats. Forest landscapes that are homogenous are not diverse. Sustainable timber harvesting is an integral part of Natural Resource Management. It can also be an example for private land owners who don't know or understand what proper forest management involves. TVA talks about healthy forests, but how are they going to maintain them without harvests? TVA had an active timber harvesting program in the past.

Cultural Resources Stewardship –

*Cultural Resource reviews of projects on TVA lands have become a roadblock for implementation. Projects can be held up for significant periods of time, causing partners to lose faith in TVA. TVA is also allowing historical structures to deteriorate because of inaction. Historic resources like the fish raceways on Clear Creek that were built to spawn fish for Norris Reservoir are eroding underneath and endangering the structures. The Cultural Resources staff has been notified of this problem for years and still nothing has been done to fix the problem. This section of TVA land was not transferred to the City of Norris in 2005 because of 'historic resources'. The city would have protected these raceways, but instead has tried to partner with TVA to no avail.*

*General comments: having been an employee of TVA for 35 years (23 in forestry and land management), I have no confidence in TVA developing a plan and actually implementing it. It seems the plan is always the product, not implementation. There always seems to be a better plan. I am also deeply disturbed at TVAs reluctance to hire more resource professionals. Why even waste the money on another plan if you do not have the needed expertise?*

**John Cristof**

*I am offering comments about the Tennessee River between Chickamauga Dam and Bridgeport AL. I am asking that all possible efforts be made to remove aquatic vegetation from the Tennessee River since it blocks the waterway and makes it difficult for boating. I am also asking that all possible efforts be made to remove trash, litter and debris from the waterway since it makes it difficult for boating. Please also make all possible effort to clean up the water quality of the Tennessee River. The river is now dirty, polluted and has a lot of trash and litter in it and on the shoreline. I am also asking that a floating dock be installed below Nickajack Dam so that boaters can launch safely. Thank you.*

**Laura Qualman**

*We are very interested in purchasing property on Tims Ford that is adjacent to TVA land. The fun begins though when you throw the fact that there is an existing dock sitting partially on top of what should have been a grandfathered in ramp (if anyone in the past had taken the time and expense to apply). The dock is in very good condition and well made to specifics sitting in the most perfect spot on the lake with no boat traffic at all in a very private hidden cove.*

*So naturally we inquired about form 26a thinking that would suffice in getting the necessary permit. Unfortunately, I was greeted with a big fat "that property is not supposed to have a dock". So knowing that there is usually a civilized answer - I've been scouring the TVA.gov page for answers. There are two forms in particular that could be the fix 1) an "after-the-fact" form OR 2) a waiver form which appears would need the TVA governing board to make that final call.*

*I also saw that TVA has invited public Input on Proposed Updates to the Natural Resource Plan – perhaps we should share this scenario with the Section 26a and Land Use Agreements Area??*

*Could someone please tell us feasible options that would allow an exception to this particular dock situation??*

*Appreciate any and all help you can share.*

**James R. Sullivan**

*I would suggest you allow Tiki Hut structures for Tract No. XGIR-200 on Kentucky Lake in New Johnsonville, TN. These would be like the ones on Son's Island. Their website is*

[www.lakeplacidisland.com](http://www.lakeplacidisland.com).

**George Munson**

*I was hoping to see something concerning the control over the impact of shoreline erosion due to wakeboard boats. I recall years ago there was something done to reduce wakes from barges traveling through the gorge just south of Chattanooga. Would like to see something done to limit the areas where wakeboard boats can operate. I live on Possum creek and have had to spend a significant amount of money on rip rap, but it is being eroded away as well.*

**Rob Noyes**

*I have done extensive on-line research in regards to Asian Carp, specifically Silver and Big Head. They have invaded some of our waters that all under TVA. I am aware of the efforts in Kentucky and Barkley Lakes. I personally would like to see some efforts into prevention in the lakes the silver and big head have not entered. I understand the big head may already be in Chickamauga. The silver carp have not made it that far yet. I would think we might want to attempt to install electronic barriers similar to those place in the Chicago area to prevent the carp from entering the Great Lakes.*

*I understand the need to reduce populations in lakes that are over-run with silver carp. I believe we should prevent them from entering new lakes if at all possible. The technology exists and works according to reports I have read. The efforts need to continue on the lakes that are overrun and at the same time we need to stop them from entering new bodies of water. The issue is complex. Barges that carry water ballast must be regulated to attempt to keep the eggs and larvae out of new lakes. Wake board boats may need to be regulated as well. But if we do not do these things now, we will have the same issues in "up river" lakes that we are experiencing in lakes that have already been invaded.*

*To my knowledge it is not too late to install barriers on Chickamauga, Watts Bar and Ft Loudon/Tellico. The damage these carp cause is incredible. Not only does it make recreational boating dangerous, the reduction in real estate value and tourism is so bad that nobody wants to talk about the issue. PLEASE look into PREVENTION where we can!*

*There is a local effort starting with <http://www.stopthecarp.org>. The basis is to educate the public and attempt to raise private monies to give to TVA, US Corp of Engineers, TWRA and/or whoever will get these barriers installed.*

*Thank you for your consideration.*

**Lindsay Gardner, Tennessee Wildlife Federation**

*Please find attached the Federation's official comments for the supplemental environmental impact statement (EIS) addressing proposed changes to TVA's Natural Resource Plan (NRP). Please let me know if you have any questions or concerns. We appreciate an opportunity to review and provide feedback. Thank you.*

Tennessee Wildlife Federation Letter Attached Below



**TENNESSEE WILDLIFE FEDERATION**  
Champions of Tennessee's Great Outdoors

August 20, 2018

Matthew Higdon, Tennessee  
Valley Authority, 400 W Summit Hill  
Drive #WT11D, Knoxville, Tennessee  
37902

Re: Supplemental environmental impact statement (EIS) addressing proposed changes to TVA's Natural Resource Plan (NRP). Comments submitted via email to [nrp@tva.gov](mailto:nrp@tva.gov).

Dear Mr. Higdon,

The Tennessee Wildlife Federation (the Federation) appreciates an opportunity to provide comments on the proposed update TVA's Natural Resource Plan (NRP) and supplement to the 2011 EIS. As TVA works to balance its energy production and environmental concerns, we support the agency's efforts to improve its efficacy, to conduct a thorough environmental review, to solicit the public's input about associated concerns for consideration during the scoping process, and to ultimately strengthen the NRP by making it more comprehensive and inclusive.

During this scoping phase, in all of the respective areas of its natural resources management the Federation recommends that TVA uphold to the fullest extent protection of wildlife and habitat, especially regarding its reservoir, wetlands and forest management practices. Wherever possible, TVA should consider and proactively respond to, direct, indirect, and cumulative impacts to wildlife and/or their habitats. TVA should address wildlife resource issues on a case-by-case basis as they arise and take a holistic management approach when considering threats to wildlife from land use changes, habitat alteration, natural events (storms, disease, and insects), impacts from public use, and invasive species. Similarly, we urge TVA to consider maximization and pursuit of stewardship, restoration and enhancement projects that address any associated impacts

to benefit fish, wildlife and habitats wherever possible. While these impacts may be considered minor and can be mitigated for, this is especially important given the fact that, as TVA notes, increase in dispersed recreation activities, developed recreation improvements, and increased shoreline stabilization could result in localized adverse impacts to wildlife from alterations of wildlife habitat and increased levels of human disturbance.

The Federation supports the addition of four new focus areas in the NRP that were excluded from the current plan as a means of addressing its program efforts to include Permitting under Section 26a of the TVA Act and land use agreements; public land protection; nuisance and invasive species management; and ecotourism. The following are comments specific to each:

#### Permitting under Section 26a of the TVA Act and land use agreements

There are 11,000 miles of shoreline under TVA's stewardship. With the value of TVA shorelines now being estimated at \$1M per shoreline mile, combined with the anticipated future increase in recreational use of TVA reservoirs for fishing, boating and other water-based pursuits, now more than ever, there is a need for continued careful consideration of shoreline permits and evaluation and protection of land uses that maximize public access and minimize impacts to fish and wildlife. While the 2018 Floating Cabin Regulations Proposed Rule Amendments are to include more limited mooring standards, limitations on expansion of floating cabins, and the requirement for owners to register floating cabins, there are still considerable issues associated with the large congregations of these structures. We urge TVA to include consideration of the health, environmental, and recreational access issues posed by floating cabins on its reservoirs as appropriate in both the EIS and NRP.

#### Public Land (and Water) Protection

TVA should continue to recognize the multipurpose benefits and uses of its public lands and waters for recreation, natural resources and wildlife and habitats. With 293,000 acres of land along TVA reservoirs for the public benefit ensuring open, safe and reliable access to and maintenance of its public lands for both dispersed and water-based recreation is of paramount importance. A 2016, University of Tennessee Institute of Agriculture study examined the level of economic impacts associated with visitation to the TVA reservoir system, concluding that the combination of aquatic recreation and waterfront property along the Tennessee Valley Authority's managed river system creates \$11.9 billion of annual economic impact—the equivalent of \$1 million per shoreline mile. In addition, the TVA-funded study found that TVA's 49 reservoirs supported about 130,000 jobs annually and 65.5M recreation visits.<sup>1</sup> Any new

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<sup>1</sup> Results from visitor and property owner surveys on Chickamauga, Norris, and Watts Bar Reservoir in summer 2016, Submitted to: Jerry G. Fouse Tennessee Valley Authority Submitted by: Neelam C. Poudyal ,

considerations for development and any associated land-use changes or impacts should continue to be carefully assessed on an individual basis, allowing for public review and comment.

#### Nuisance and Invasive Species Management

Aquatic vegetation management is critical to TVA reservoirs and fisheries. Recognizing that TVA maintains a robust Aquatic Plant Management Program that addresses non-native vegetation in reservoirs, we urge that the agency continue to strengthen its efforts to provide real-time, on-site public notification about chemical application to waters in the EIS and NRP. In addition to posting the treatment schedule on the TVA website, TVA should consider posting signs in the affected areas to inform those recreating on the water about real-time herbicide applications.

Asian carp are now found in all three of Tennessee's grand divisions—from the Mississippi to the Tennessee River north of Chattanooga and threaten recreational fishing and boating. TVA reservoirs are nationally known and provide popular venues for anglers to pursue a variety of sport fish including bass, crappie, walleye, trout and catfish. Bass are one of the most sought after species of the sport bringing anglers from all over the United States to fish the Tennessee River Valley reservoirs. The Bass Angler Sportsman Society (B.A.S.S.), one of the most recognized bass tournament organizations, identifies six of TVA reservoirs (South Holston, Watauga, Chickamauga, Gunterville, Pickwick and Kentucky) as the top 25 reservoirs to bass fish in the Southeast US.<sup>2</sup> The popularity of tournament fishing is a boost to the local economies and is why many Tennessee cities and counties are working to recruit national and regional tournament trails. In July of 2018, Bassmaster ranked Chickamauga Lake #2 in the nation and #1 in the Southeast Region for the 100 Best Bass Lakes in the country<sup>3</sup>.

Left unaddressed, Asian carp will continue to devastate our fisheries and damage our state's recreational economies. We strongly urge TVA to include information about its Asian carp strategy and any associated activities and projects in the updated EIS and NRP. In particular, TVA needs to address streamlining the process to be required for installation of barriers at TVA locks.

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Hayley Gotwald, Burton English, Kim Jensen, Jamey Menard, Carlotta Caplenor, Cristina Maldonado, David Watkins University of Tennessee Institute of Agriculture (UTIA) Knoxville, TN 37996, March 24, 2017.

<sup>2</sup> 25 Best Bass Lakes: Southeastern, <https://www.bassmaster.com/best-bass-lakes/slideshow/25-best-bass-lakes-southeastern>

<sup>3</sup> 2018 Best Bass Lakes Revealed, <https://www.bassmaster.com/news/2018s-best-bass-lakes-revealed>

## Ecotourism

The inclusion of three new TVA ecotourism programs in the 2020 NRP sounds like a development that has the potential to increase use of TVA's public lands, stewardship, and support for conservation initiatives. Similarly, increased visitation to natural and ecologically sensitive areas without adequate planning and management has the potential to lead to environmental degradation and harm to wildlife. We encourage TVA to thoughtfully consider and address any potential ways that newly-introduced ecotourism programs may inadvertently lead to impacts in the EIS and/or NRP. Specifically, TVA should consider the cumulative impacts of any on-the-ground aspects of the programs, as well as any potential associated changes in land use designations and/or reservoir management plans.

Regarding progress and success measurement, as we understand it, TVA is proposing changes. Specifically, these will include how the NRP will be updated and the public made aware of its plan implementation, by eliminating the provision for five year plan updates and instead publishing an Annual Report on Natural Resources' stewardship efforts and by improving the information available to the public on TVA's stewardship projects on TVA's web page. Are these actions intended to take the place of or supplement TVA's historical annual NRP review? Also, TVA proposes to do away with the NRP measures of success, instead focusing on high-level overarching strategic direction for each area. TVA should include metrics to define how progress and success will best be gauged and communicated.

The Federation appreciates consideration of these scoping comments and looks forward to an opportunity to review the draft EIS and updated NRP. Thank you.

Sincerely,



Lindsay A. Gardner  
Conservation Policy Manager

**Logan Carmichael**

*Attached is my letter of public comment on the TVA's NRP Updates.*

Logan Carmichael's Letter Is Attached Below

**Logan Carmichael**

Tennessee Valley Authority  
ATTN: Matthew Higdon  
NEPA Compliance  
400 West Summit Hull Drive, WT 11B  
Knoxville, TN 37902

Re: Proposed Updates to TVA Natural Resource Plan

July 18, 2018

To Whom It May Concern:

In response to your request for public comment on updates to the Tennessee Valley Authority's proposed updates to their Natural Resource Plan (NRP) for 2020, I would like to add a few of my thoughts and observations as a private citizen living adjacent to TVA-owned reservoir land in regards to strengths TVA currently has and areas that could use improvement.

To begin with, the public is very fortunate to have such good stewards as TVA in our communities and region. TVA provides not only valuable resources such as affordable electricity, flood control, employment opportunities, and other public services too numerous to mention, but TVA has provided recreational lands that of many types all open to the public. From simple day areas for picnics, fishing, and water recreation to boat ramps, hiking trails, hunting lands and much more! Our region is very fortunate to have these available resources all provided and maintained by TVA.

As a now homeowner and longtime resident living and growing up adjacent to TVA land that is zoned as Undeveloped Recreation along the Tennessee River at Nickajack Lake, I've seen many changes over the years to the land. The property, which borders the river's shoreline, was once clear and open with plenty of room for fishing from the riverbank or just enjoying the views of the beautiful scenery at Nickajack Lake. Sunset views were amazing from our home and for our entire neighborhood in Halletown. Residents could easily walk from their homes to the riverbanks to fish and there were never any issues with violence, parties, or other problems on the property since TVA Police kept a watchful eye on things along with local law enforcement and TWRA officers.

This was true from my childhood living at the same address I live at now until sometime around 2003 or 2004, when the land adjacent to ours was either re-classified or modified to become Zone 4 (Natural Resource Conservation). Homeowners in the neighborhood had been mowing and maintaining the land for several years after TVA ceased maintenance on the property and were told that they must stop or face a fine because the property had been classified as "wetlands" and a "nature preserve" by

officials. An access road and several trails remained on the property from years of wear by ATV's and other vehicles that were used to access the river for fishing and a sign was placed at the trailhead at the end of my street stating that "no motorized vehicles or overnight camping were permitted" and that was the last we saw of TVA for some time.

As the years have passed since the early 2000s, the land has become completely overgrown with native and non-native and invasive trees, brush, and other nuisances. The land is now home to trees and plants such as the Mimosa, Tree-of-heaven, English Ivy, Privet, Kudzu, Honeysuckles and others that have now overtaken the once-clear property and are intruding on what native trees and plant life already existed on the property. These nuisance invasive species have also been found creeping on to our own property, which was previously not a problem as the TVA property had been kept clean of any overgrowth and invasive plant life.

Along with the mass growth of vegetation and a more "woods-like" setting, we've also seen nuisance wildlife in abundance. While I know that some of these animals have seen their own habitats encroached on by humans which has resulted in the uptick in their numbers, I feel some of this would be avoided if we were not bordered by overgrown and untamed TVA land. Over the past two years (since July 2016), coyotes have become a very big problem for our neighborhood. They've killed many resident's pets and can be heard and seen on any given night. I've personally seen a pack of about thirteen playing in a neighbor's front yard adjacent to TVA land. I've had three at once in my own yard attempting to get to small waterfowl livestock that I raise and keep.

We've had locals who have attempted to hunt these coyotes in order to "thin their packs" with no luck. They have dens nearby on the mountain and use the surrounding woods to travel. They have a large den on adjacent woodland and stay undercover in the woods with ease. They are not scared of humans. When I've confronted them, they take their time to runaway and don't seem the least bit scared by my presence. They aren't even scared and seem somewhat combative to my Great Pyrenees dog, which is a livestock guardian dog who generally can protect livestock from these nuisance animals.

Coyotes are only one of the nuisance wildlife we've seen come from the adjacent woods. Opossum, Raccoon, and fox are others along with an increased number of venomous snake species including Copperhead, Western Cottonmouth, and Timber Rattlesnakes. Again, I understand that their presence is a natural occurrence and they are native to our area, but I feel the overabundance can be contributed to the adjacent lands and their lack of management. As a parent of young children, I take great concern about these nuisance wildlife that could pose a danger to my family and pets. While coyote aren't known to be threatening to humans -- I still find concern in the fact they are not "scared" by an adult human...now imagine a small child being preyed on by

them. Easily the same size as some of their natural (normal) prey in the wild. Snakes are always a concern, of course, and having overgrown land so close makes our attempts to keep them at bay more of a process along with rats and other vermin.

Additionally (and of our most concern), the grown-up land has brought another problem to our neighborhood. The land is very secluded, which means many un-invited human nuisances make use of the land for less-than-desirable uses. While the sign clearly states "no motorized vehicles or overnight camping," we've had multiple vagrant types camping on the property and basically living there for weeks at a time, which goes against TVA Land Use policies outlined on your public website. While most of us in the neighborhood have never minded a camper, the problem now has become what takes place at these secluded campsites. There's no doubt that illegal drug use and sales have been taking place based on the people seen and the amount of traffic in and out of the land.

Multiple residents have contacted TVA Police over the years regarding these issues and have received little response. I've contacted my local authorities and they do very little about the issue since it is taking place on TVA property and not readily-accessible by a paved public road. My most recent call to TVA Police resulted in no one checking out the issue with on-and-off campers who left behind syringes (needles) and other trash along with building a tent or 'teepee' structure on the property. This makes too many occasions where nothing has been done and the issues continue. When the land was clear, we didn't see this problem because they were easily seen and out in the open.

I think the only other negative aspect regarding this Zone 4 "natural resource conservation" designation and how the land has grown up is that it has destroyed the view we, the residents in Haletown, once had of the lake and area mountains. Many of us purchased or maintained our homes here not only for the conveniences of being near the lake for recreation, near the Interstate for work commutes, etc., but we also purchased for a beautiful scenic view. Sure, a nature preserve can be beautiful! One that is maintained and has scenery worth seeing, but we don't have that... We have an overgrowth of 'scraggly' brush and vines with an abundance of undergrowth below the tree canopy that affords no views into the woods or trees and zero views of the shoreline. It's inaccessible in most places and now given the nature of those that do travel into the woods, most of us simply avoid using the land, which is truly sad.

If TVA wishes to maintain a "natural resource conservation" for lands that border shorelines, but sit adjacent or between the shoreline and neighborhoods; more input from those residents should be taken into consideration. No one ever contacted any of us nor asked our opinions. If it was open to public comment, we were never notified. If it was put in the local newspapers, it was done so in a way that most residents didn't understand what they were talking about or it wasn't printed where they would see it.

We were just told one day that it was now a "nature preserve and bird sanctuary" by a very unfriendly representative of TVA who informed us the land could no longer be mowed. While I understand and applaud TVA's mission to create these conservations in addition to sensitive resource management areas, I also question how and why some of these lands were chosen based on what surrounds them. In the case of the land adjacent to my property (Tract # XNDR-27PT2), it's surrounded by developed recreation (Zone 6), Industrial (Zone 5), and privately-owned land all right on the edge of a neighborhood.

If TVA cannot manage the lands in these Zone 4 (and other zones) near a neighborhood, in an effort to keep nuisance wildlife and nuisance plant and tree species to a minimum, while keeping the land safe and free of vagrants and undesired human activities...along with preserving the homeowners' views and recreation, I see no need for classifying these lands as such. My personal opinion is that this particular tract should be cleared and bush-hogged immediately as it poses a safety hazard to us most of the time and a fire hazard in dry weather with all of the brush.

Many great things have been done in our particular reservoir to create awesome recreation opportunities to the public. From Cedar Mountain's trails and wildlife to the hiking loop at Little Cedar Mountain and the bat habitat at Nickajack Cave...there's so many positive things that actually do have a good impact on our communities and the land and habitats around them. I have no doubts that these will continue to flourish for years to come. I just hope that more consideration will be taken when designating zones for land going forward. I feel like our neighborhood's landmark was destroyed once that land grew up. We have nothing to show for it now but pests and problems and no one to help us since the land is now a conservation. Why we can't law enforcement assistance is another issue, but I digress.

If you would like to discuss this further, I can be contacted at the address, phone number, and email provided. Thank you again for your efforts in our region and thank you for your consideration on my remarks made here.

Regards,



Logan Carmichael  
Resident

[Redacted]

[Redacted]

## **Linda Hixson**

*I appreciated the opportunity to talk with Bucky Edmondson, Clay Guerry, and a number of other Tennessee Valley Authority (TVA) employees at the July 26, 2018 public meeting in Chattanooga that was held by TVA for the purpose of gathering public input for its 2020 Natural Resource Plan. I was pleased to see TVA have “Ecotourism” as one of its focus areas and to hear of the various steps being taken by TVA to strengthen the stewardship portion of its mission. TVA’s recreation staff and natural resources staff worked closely with the committee (of the Hixson Branch of the Chattanooga Area Chamber of Commerce) that I chaired to plan the North Chickamauga Creek Greenway in the late 1980s and so I was aware of the changes taking place within TVA at that time that eventually resulted in the staff, instead of remaining a cohesive unit with an office in Norris, Tennessee, being parceled out to various offices throughout the TVA system. I hope that the stewardship portion of TVA’s mission will continue to make progress toward receiving the emphasis and support that it so well deserves. Good stewardship is key to sustaining the economic viability of the Tennessee Valley region and to growing our economy in ways that make sense for the future.*

*My primary purpose in attending the meeting and providing this information is to be sure that TVA planners working on the 2020 Natural Resource Plan take into account the Great Eastern Trail (GET) and the route it is expected to take through the Chattanooga area. First, some background information and an overview of the current status of the work underway to establish the GET within its preferred route here.*

*A significant portion of the GET’s route will utilize the North Chickamauga Creek corridor. The work of the Chamber of Commerce committee (assisted by the TVA staff) that I mentioned above resulted in the development and publication of the North Chickamauga Creek Greenway Plan which focused on land conservation and trail development along the lower 8 miles of the creek, the section that flows through the Hixson area of Chattanooga and a portion of TVA’s Chickamauga Reservation and empties into the Tennessee River just below the Chickamauga Dam. The Greenway plan was officially adopted by the City of Chattanooga on December 19, 1989 and in furtherance of implementation of the plan, TVA built a trailhead and multi-purpose trail along North Chickamauga Creek on its Chickamauga Reservation, then conveyed to the City a 40-acre easement along the creek that included these recreational amenities. A grand opening celebration for this initial segment of the greenway was held on May 19, 1990. TVA further supported the greenway project by establishing the 207-acre Big Ridge Small Wild Area (SWA) on the portion of the Chickamauga Reservation adjoining the greenway easement area and with the assistance of a Scout group built a foot trail that loops through the SWA and links with the greenway trail. The City established a greenways advisory committee, acquired a 180-acre farm (now known as Greenway Farm) adjoining the TVA tract and extended the greenway trail through the farm. Additional segments of the greenway trail have been developed at various locations along the creek in furtherance of the goal of having a continuous trail from the riverfront to the North Chickamauga Creek Gorge. The effort to acquire additional land and conservation easements for extension of the North Chickamauga Creek Greenway along the entire length of the creek, through a partnership effort involving cooperative landowners, the City of Chattanooga, the North Chickamauga Creek Conservancy, and the State of Tennessee (Tennessee Department of Environment & Conservation (TDEC) - State Natural Areas and Cumberland Trail State Park, and the Tennessee Wildlife Resources Agency (TWRA)), has been very successful with thousands of acres having been acquired. The State’s Cumberland Trail is located along the creek atop Walden’s Ridge and within the North*

*Chickamauga Creek Gorge. A trailhead for the Cumberland Trail is located at the mouth of the gorge.*

*Currently, as I mentioned to the TVA employees in our conversations at the July 26th meeting, I am chairing the Great Eastern Trail-Chattanooga Committee of the Cumberland Trails Conference (CTC). CTC is the regional partner of the Great Eastern Trail Association (GETA) for the State of Tennessee. The Great Eastern Trail (GET) is a relatively new long-distance hiking trail that in many ways is comparable to the Appalachian Trail. It extends from Alabama to New York and potentially will connect with trail systems in Florida and Canada. It is being created by linking together regional trail systems. More than 70% of the GET is currently open to hiking. More information about the GET and the GETA can be obtained by contacting GETA's president, Tom Johnson, at johnts25[at]gmail.com. The CTC's Great Eastern Trail-Chattanooga Committee was created because of the need to address a gap in the GET's route that included the Chattanooga area.*

*For most of its journey across the State of Tennessee, the Great Eastern Trail (GET) is co-aligned with the Cumberland Trail. A memorandum of understanding (MOU) has been signed by TDEC and GETA allowing the co-alignment. A gap exists, however, between the Cumberland Trail and the next (to the south) regional trail with which the GET will co-align, the Georgia Pinhoti Trail. In 2010, the Cumberland Trails Conference (CTC) created the Great Eastern Trail-Chattanooga Committee to evaluate route options for closing the portion of this gap existing within the State of Tennessee and to recommend a preferred route. That work, which included extensive field research, was completed during Jim Schroeder's chairmanship of CTC's GET-Chattanooga Committee and was presented to the GETA board at its April 2013 meeting held in Chattanooga. Attached to this email message is a copy of the map showing the preferred route (the gold line) for the GET through the Chattanooga area. The map also shows an interim (largely road walk) route (the green line) that can be used by GET thru-hikers while work on completing the GET's preferred route is underway. Also attached to this email message is a copy of the portion of the Tennessee Riverpark master plan showing the "Dupont" segment of the Riverwalk and the "C. B. Robinson Bridge" which are mentioned in the description of the GET's route provided in the following paragraph. (For ease of reference, I use the term "Riverwalk" for those segments of the Tennessee Riverpark master plan to be located on the north side of the Tennessee River, but want to note here that there has been some discussion over the years as to whether or not the Riverwalk segments on the north side of the river will be developed according to the existing Riverwalk standard or whether the Greenway standard will be used.)*

*The preferred route of the GET through the Chattanooga area is 26 miles in length and it begins at the Cumberland Trail's existing trailhead within the North Chickamauga Creek Gorge (off Montlake Road in the Soddy-Daisy area) and proceeds southward within the North Chickamauga Creek corridor, using existing and future segments of the North Chickamauga Creek Greenway trail (the Greenway trail along the lower 8 miles of the creek is covered by the existing North Chickamauga Creek Greenway master plan and a proposed route for the trail that will be along the section of the creek north of Mile 8 to the Cumberland Trail's trailhead at the Gorge, has been developed based on extensive study and field work by members of CTC's Great Eastern Trail-Chattanooga Committee); the GET then uses, on the north side (right bank) of the Tennessee River, the future "Dupont" segment of the Tennessee Riverpark master plan (which will connect (a) the North Chickamauga Creek Greenway's Lake Resort Drive trailhead and Chickamauga Dam with (b) the City's Dupont Park and soccer fields and the C. B. Robinson Bridge); uses the future multi-use (pedestrian/bicycle) path on the C. B. Robinson Bridge envisioned by the Tennessee Riverpark master plan to*

reach the existing Tennessee Riverpark and Riverwalk on the south side of the Tennessee River; the final 10 miles of the GET's preferred route are complete as the GET follows the existing Riverwalk southward to the St. Elmo area and the base of Lookout Mountain, ascends Lookout Mountain via the existing Guild Trail and then continues southward on Lookout Mountain, using certain existing trails within the National Park Service's Lookout Mountain unit of the Chickamauga-Chattanooga National Military Park (an MOU has been signed by NPS and GETA allowing the co-alignment), to the Tennessee-Georgia state line. After leaving the National Park Service trail, the GET will continue on its journey to eventual linkage with the Georgia Pinhoti Trail by following the Cloudland Connector Trail, recently completed by the Lula Lake Land Trust, to the Cloudland Canyon State Park in Georgia.

GETA's board, at its meeting held in Chattanooga in April 2013, designated the City of Chattanooga as the Great Eastern Trail's first official "trail town," making Chattanooga the largest city in the country by far to host a major long-distance hiking trail. The City of Chattanooga, in cooperation with the Tennessee Department of Transportation (TDOT), began a structural study of the C. B. Robinson Bridge to determine the feasibility of adding pedestrian/bicycle access to the bridge. The findings of the completed (Sept. 8, 2017) study (which looked at increasing traffic lanes on the bridge from the current 6 traffic lanes to 8 traffic lanes plus a multi-use path) are that with some girder retrofits, the bridge can handle the increased load. Two options for the girder retrofits were identified with the least expensive option being using post-tensioning at an estimated cost of \$250,000. The study does not indicate, at least to my understanding of it, whether girder retrofits would be needed if only the multi-use path were added to the existing 6 traffic lanes. For the multi-use path to be added to the bridge, funding for the work of doing so, whether the work be simply adjusting the traffic lanes to add the multi-use path or doing girder retrofits plus adjusting the traffic lanes to add the multi-use path, will need to be secured.

The Army Corps of Engineers work on replacing and expanding the Chickamauga Lock, due to budget shortfalls, has greatly exceeded the amount of time originally estimated for its completion. The lock project has been underway for the past decade and is expected to take several more years to complete. The construction work has thus far delayed establishment of the Dupont segment of the Riverwalk and is blocking access from Lake Resort Drive to the North Chickamauga Creek Greenway's southernmost trailhead. (The trailhead has continued to be accessible by foot from the City's Greenway Farm located (to the north) on Hamill Road in Hixson.) During our studies of the routing options for the GET, it has been suggested that, with the GET being a hiking trail, as an interim measure until the TVA portion of the Dupont segment of the Riverwalk is established (whether that be during or after completion of the lock project), it would be possible for the GET to be routed around the active construction area at the lock project so that linkage could be made between the Greenway's trailhead and the C. B. Robinson Bridge and via the aforesaid multi-use path on the bridge, the Riverpark and Riverwalk on the south side of the Tennessee River. (The Rivermont segment of the Riverwalk, being downstream of the C. B. Robinson Bridge, is not part of the GET's route, however, it will connect to the Dupont segment which is part of the GET's route. It is anticipated that the Rivermont segment will be established as part of the recently approved new riverfront mixed use development called "Riverton." When both the Rivermont and Dupont segments are completed, trail linkage will exist for the Greenway and the City's Dupont Park (soccer fields) and Rivermont Park (tennis courts, baseball fields, boat launch, etc.) We would be happy to share with TVA and the Corps our studies of the possible interim routing of the GET around the lock project construction site and hope that TVA will actively encourage and support prompt re-establishment of reasonable access from the south to the Greenway's trailhead. Given the proximity of TVA's Power Service Center to the future

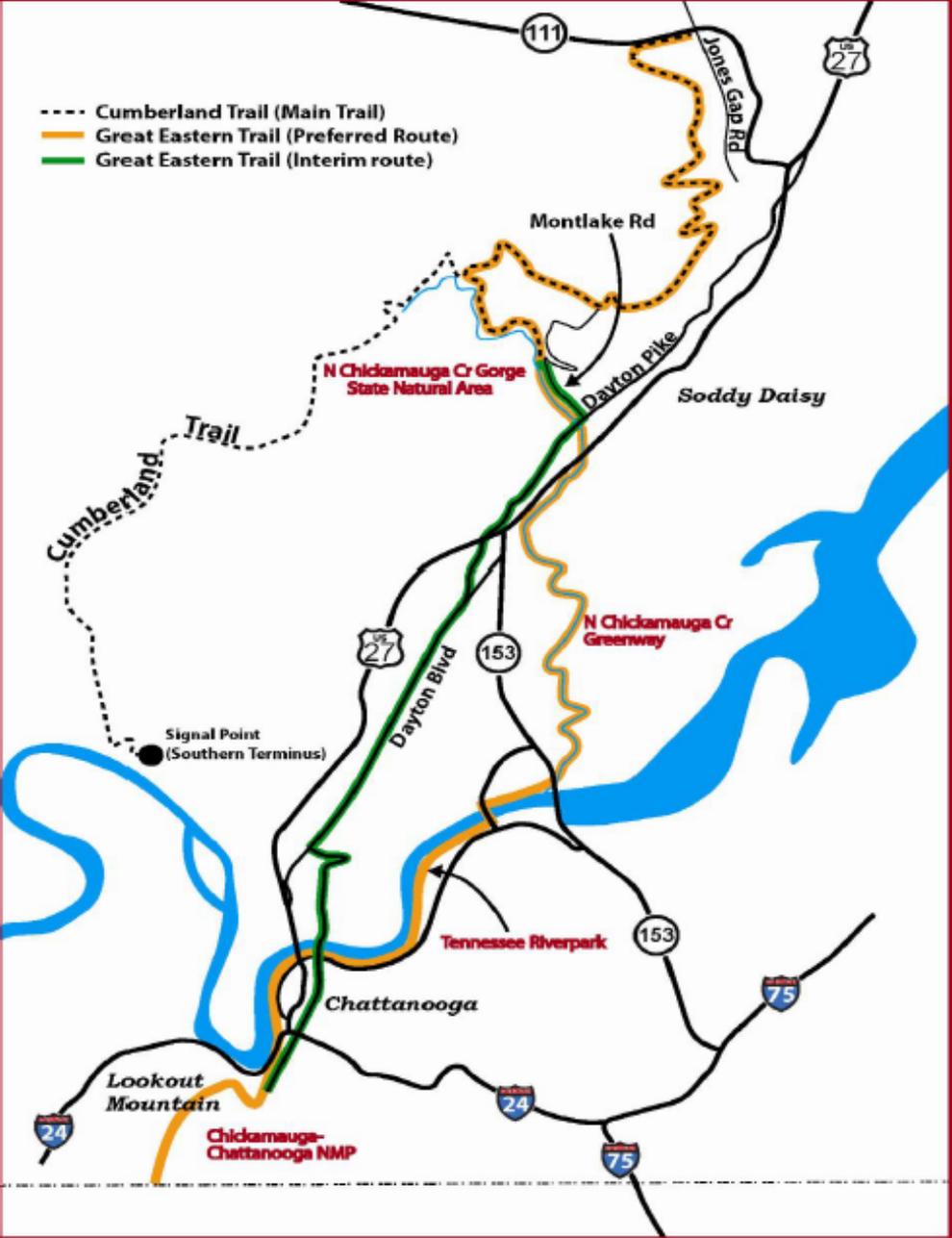
*Dupont segment of the Riverwalk and to the North Chickamauga Creek Greenway, TVA and its employees have a special stake in seeing the GET and the associated important trail linkages be established.*

*A possible emerging issue for management of TVA's public lands that I'd like to mention for your consideration is the effect of decisions that may be made by the Department of Homeland Security. I hope that TVA's natural resources, recreation and security staff and appropriate staff of the Department of Homeland Security have established or will establish appropriate channels of communication so that each will have the benefit of the other's knowledge and expertise and decisions imposing restrictions, that serve no compelling purpose or need, on the public's use of TVA's lands and decisions that have unanticipated adverse impacts on TVA's management of its public lands can be avoided.*

*The final matter that I want to bring to TVA's attention for purposes of its 2020 Natural Resource Plan and for its general consideration is that I have been told that representatives of TVA have requested, informally at this point, I assume, that the Tennessee Department of Transportation (TDOT) permanently relocate State Highway 153 traffic from the Thrasher Bridge on Chickamauga Dam to the C. B. Robinson Bridge. As a resident of the Hixson area, I hope that the Thrasher Bridge can remain and continue to serve motorists' needs and that if it ever ceases to serve those needs, the traffic can be transferred to a new bridge in the vicinity rather than being added to traffic on the C. B. Robinson Bridge. However, should motor vehicle traffic ever be, in fact, removed from the Thrasher Bridge, I hope TVA would give consideration to retaining some of the structure of the bridge for purposes of providing a multi-use (e.g. pedestrian/bicycle) pathway that would serve to link the Riverwalk on the south side of the Tennessee River (the Riverwalk there already extends to Chickamauga Dam) with the North Chickamauga Creek Greenway trail (and with the Dupont and Rivermont segments of the Riverwalk) on the north side of the river. A pathway over the Dam would provide a very scenic route for the GET/Greenway/Riverwalk across the Tennessee River (perhaps appropriate displays and/or exhibits could be installed along the pathway and serve to educate the public about TVA's mission and operations) and if a multi-use path on the C. B. Robinson Bridge has already been established at that time, a very nice loop trail would be created that I expect would be popular with residents and visitors alike.*

*Thank you for your consideration of my comments. If you have any questions or want further information about the Great Eastern Trail and its planned Chattanooga area segment, please feel free to contact me. So that I will know that my comments have been actually received, I would appreciate you sending me an acknowledgment of your receipt of this message.*

*Linda Hixon Included the Map Below With Her Comments*



## **APPENDIX F: COMMENTS SUBMITTED BY OTHER AGENCIES AND OFFICIALS**



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Tennessee ES Office  
446 Neal Street  
Cookeville, Tennessee 38501



August 13, 2018

Mr. Matthew Higdon  
Tennessee Valley Authority  
400 W Summit Hill Drive #WT11D  
Knoxville, Tennessee 37902

U.S. Fish and Wildlife Service (Service) personnel have reviewed the Tennessee Valley Authority's (TVA) Notice of Intent (NOI) to prepare a supplemental environmental impact statement (EIS) addressing proposed changes to your Natural Resource Plan (NRP). TVA has determined that the existing 2011 NRP is not all encompassing of TVA's Natural Resources programs and by not being inclusive, the NRP is not comprehensive. TVA further concluded that the NRP is not fully serving as the guide for business and budget planning as initially envisioned, and the non-comprehensive program coverage is impacting the plan's usefulness to the Natural Resources group as a management guide. Therefore, TVA is proposing changes to the NRP's structure and to the range of programs it identifies. The proposed update to the NRP would be consistent with the Blended Management alternative approved by the TVA Board of Directors in August 2011. TVA is considering these changes in a supplement to the 2011 EIS.

TVA proposes to reorganize the plan and its programs into ten new "focus areas" rather than the six resource areas identified in the 2011 plan. TVA would address additional program efforts in the NRP, including, permitting under Section 26a of the TVA Act and land use agreements; public land protection; nuisance and invasive species management; and ecotourism. The ten new focus areas in the NRP would ensure that the plan addresses the entire scope of the TVA Natural Resources group's stewardship efforts. In addition, certain programs described in the 2011 NRP would be regrouped to create focus areas that better reflect the Natural Resources' efforts in order to improve the plan's clarity and usefulness. TVA also proposes to remove some programs from its NRP because these programs are managed better by other entities (e.g., universities, other TVA organizations, non-TVA entities); however, even if a program would be removed from the NRP, TVA may continue to support the management of these programs. Lastly, TVA proposes to add several new programs under the ten focus areas.

The ten new focus areas would include the following: Land and Habitat Stewardship (Biological Resources in the current NRP); Cultural Resources Management (currently Cultural Resources in the NRP); Water Resources Stewardship (currently Water Resources in the NRP); Public Outreach and Information (currently Public Engagement in the NRP); Reservoir Lands Planning (no change); Recreation (currently Recreation Management in the NRP); Public Land Protection

(new); Nuisance and Invasive Species Management (new); Ecotourism (new); and Section 26a and Land Use Agreements (new).

In the revised NRP, you would eliminate the provision of the NRP that calls for periodic (5-year) updates to the plan. Alternatively, TVA proposes to inform the public of its activities and progress by publishing an Annual Report on Natural Resources' stewardship efforts and by improving the information available to the public on TVA's stewardship projects on TVA's web page. To complement the strategic guidance that the updated NRP would provide, TVA's Natural Resources group would develop a 3-5 Year Action Plan to provide a tactical approach to implement the specific activities associated with each of the ten focus area programs.

The revised NRP will be considered as an action alternative in the supplemental EIS. After consideration of the public's input and analyzing the environmental consequences of alternatives, TVA will issue a draft EIS for public review and comment.

At this time, Service field offices in the seven-state TVA power service area have no comments to offer regarding the proposed revisions to TVA's NRP, other than to indicate support for TVA's efforts to reorganize the plan. After TVA develops a draft EIS and selects a "Preferred Alternative", we shall provide specific comments. If we can be of further assistance, please contact Todd Shaw of my staff at (931) 525-4985 or by email at [ross\\_shaw@fws.gov](mailto:ross_shaw@fws.gov).

Sincerely,



Kurt Snider  
Acting Field Supervisor

xc: Stephanie Nash, FWS - BER (ERT)  
Christine Willis, FWS - Southeast Region  
Troy Andersen, FWS - VA ESO  
Bryan Tompkins, FWS - Asheville, NC ESO  
David Felder, FWS - MS ESO  
Robin Goodloe, FWS - Athens, GA ESO  
Jessica Miller, FWS - KY ESO  
Jeff Powell, FWS - Daphne, AL ESO

